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1.0 Project Description and Objectives

1.1 Process and/or Environmental System to be Evaluated

This investigation is being conducted to provide technical support to EPA Region VIII to complete a ground-water investigation near Pavillion, Wyoming under authority of the Comprehensive Environmental Response, Compensation, and Liability Act. EPA Region VIII is lead organization of this investigation. The investigation was initiated in response to complaints about odors and taste associated with water in domestic wells. Potential sources of ground-water contamination include activities associated with oil and gas production such as leaking or abandoned pits, gas well completion and enhancement techniques, improperly plugged and abandoned wells, as well as activities associated with residential or agricultural practices. EPA Region VIII has completed two phases of domestic well sampling in addition to collecting surface water and soil samples to determine potential sources of contamination in the area which include but are not restricted to natural gas development

1.2 Purpose of the Project and Specific Project Objectives

NRMRL-Ada will assist EPA Region VIII in this investigation by: (1) installing two deep monitoring wells in two areas where contamination is suspected, (2) sampling these wells as well as from a subset of existing domestic wells, (3) providing samples to the EPA Region VIII laboratory for analysis of organic compounds, (4) analyzing ground-water samples for major ions, inorganic compounds, metals and dissolved gases at NRMRL-Ada's laboratory in Oklahoma as well as stable isotopes of dissolved inorganic carbon at Isotech Laboratories, (5) conducting a soil-gas survey using the Geoprobe Post Run Tube (PRT) System and screening samples in the field for fixed gases and total hydrocarbons using portable gas analyzers, and (6) installing dedicated soil-gas probes and collecting samples for analysis of fixed gases, light hydrocarbons, and isotopes at a Istotech Laboratories. A tentative schedule of field activities is provided in **Table 1**.

In addition to assisting EPA Region VIII in this investigation, field activities at this site will assist NRMRL-Ada in understanding the transport of gases in deep subsurface media and associated geochemical reactions in ground water. While carbon dioxide (CO₂) is not a gas of concern in the Pavillion area, subsurface conditions at Pavillion serve as an anthropogenic analogue for study of geologic sequestration of CO₂. Geological sequestration is recognized as the injection and subsequent long-term trapping of gaseous, liquid, or supercritical CO₂ in subsurface media – primarily saline formations, depleted or nearly depleted oil and gas reservoirs, and coal seams. Carbon capture, transport, and storage via geologic sequestration from stationary sources of CO₂ such as refineries, and coal-fired electric, ethanol, cement, and fertilizer plants could allow continued use of fossil fuels in a manner that greatly reduces CO₂ emissions until alternative energy sources are deployed on a large scale in the coming decades.

One research objective of this study is to evaluate the feasibility of using soil-gas measurements to detect the migration of gases from deep subsurface media. It is widely acknowledged that leakage through transmissive faults (and associated fractures) and well penetrations (operational, non-operational, and abandoned wells) are the most likely potential pathway for CO₂ release from a storage formation at a properly selected site for geologic sequestration. Leakage through transmissive faults and well penetrations could result in intrusion of CO₂ or brine into underground sources of drinking water (USDWs), release of CO₂ to the vadose zone and the atmosphere, and intrusion of CO₂ into buildings. Release of CO₂ or brine into a USDW

could be accompanied by measurable alteration in pH, major ions, and mobilization of hazardous inorganics. Release of CO₂ into the vadose zone could be accompanied by compositional changes in soil gas and flux to the atmosphere. Release of CO₂ into buildings could result in increased CO₂ and potential reduction in oxygen in indoor air. The area of investigation near Pavillion has a large number of well penetrations (production and abandoned wells) under pressure similar to enhanced oil recovery. Also, stimulation of gas production wells may have resulted in fracture networks in deep subsurface media deposits similar to that which would occur near faults. If a soil-gas survey at this site identifies anomalies of light hydrocarbons and gases, it is likely that soil-gas sampling will be an effective technology for monitoring and verifying storage of CO₂ at a site much more suitable for storage of CO₂.

Another research objective of this study which is relevant to geologic sequestration is to develop a sampling methodology that allows collection of ground-water samples approaching or in excess of 1000' below ground surface while retaining dissolved gases. Dissolved gases such as CH₄ and CO₂ off gas during ground-water sample retrieval using conventional methodologies.

2.0 Organization and Responsibilities

2.1 Identification of Key Personnel and Responsibilities

Dr. Dominic DiGiulio, U.S. Environmental Protection Agency, Office of Research and Development, National Risk Management Research Laboratory, Robert S. Kerr Environmental Research Center, Ada, OK. Dr. DiGiulio is the principal investigator of this project and is responsible for ensuring completion of all aspects of this QAPP. He will lead the collection, analysis, and interpretation of soil-gas samples. He is the work assignment manager for overseeing the installation of monitoring wells. His COR certification is current. He is the Health and Safety Officer for soil-gas sampling activities carried out by NRMRL-Ada. His HAZWOPER certification is current.

Dr. Richard Wilkin, U.S. Environmental Protection Agency, Office of Research and Development, National Risk Management Research Laboratory, Robert S. Kerr Environmental Research Center, Ada, OK. Dr. Wilkin is a co-principal investigator for this project. He will lead all aspects of this investigation related to the collection, analysis, and interpretation of ground-water samples. He is the Health and Safety Officer for ground-water sampling activities carried out by NRMRL-Ada. His HAZWOPER certification is current.

Dr. Randall Ross, U.S. Environmental Protection Agency, Office of Research and Development, National Risk Management Research Laboratory, Robert S. Kerr Environmental Research Center, Ada, OK. Dr. Ross is responsible assisting Dr. Wilkin in designing the ground-water sample collection methodology and for assisting in the collection of ground-water samples. His HAZWOPER certification is current.

Mr. Steven Acree, U.S. Environmental Protection Agency, Office of Research and Development, National Risk Management Research Laboratory, Robert S. Kerr Environmental Research Center, Ada, OK. Mr. Acree is responsible assisting Dr. Wilkin in designing the ground-water sample collection methodology and for assisting in the collection of ground-water samples. He is the co - work assignment manager for overseeing the installation of monitoring wells. His COR and HAZWOPER certifications are current.

Dr. Junqi Huang, U.S. Environmental Protection Agency, Office of Research and Development, National Risk Management Research Laboratory, Robert S. Kerr Environmental Research Center, Ada, OK. Dr. Huang is responsible for development of a conceptual model for groundwater flow. His HAZWOPER certification is current.

Ms. Kristie Hargrove, U.S. Environmental Protection Agency, Office of Research and Development, National Risk Management Research Laboratory, Robert S. Kerr Environmental Research Center (RSKERC), Ada, OK. Ms. Hargrove is responsible for assisting Dr. DiGiulio in collecting soil-gas samples and in maintaining, operating, and calibrating all portable gas analyzers used in the field. Her HAZWOPER certification is current.

Mr. Ken Jewell, U.S. Environmental Protection Agency, Office of Research and Development, National Risk Management Research Laboratory, Robert S. Kerr Environmental Research Center (RSKERC), Ada, OK. Mr. Jewell is responsible for operation of the Geoprobe rig during soil-gas sampling. His HAZWOPER certification is current.

Mr. Russell Neill, U.S. Environmental Protection Agency, Office of Research and Development, National Risk Management Research Laboratory, Robert S. Kerr Environmental Research Center (RSKERC), Ada, OK. Mr. Neill is responsible for operation of the Geoprobe rig and assisting Dr. DiGiulio in overseeing installation of monitoring wells. His HAZWOPER certification is current.

Mr. Tim Lankford, U.S. Environmental Protection Agency, Office of Research and Development, National Risk Management Research Laboratory, Robert S. Kerr Environmental Research Center (RSKERC), Ada, OK. Mr. Lankford is responsible for assisting Mr. Jewell and Mr. Neill in operation of the Geoprobe rig. His HAZWOPER certification is current.

Mr. Tony Lee, U.S. Environmental Protection Agency, Office of Research and Development, National Risk Management Research Laboratory, Robert S. Kerr Environmental Research Center (RSKERC), Ada, OK. Mr. Lee is responsible for assisting in the ground-water sampling. His HAZWOPER certification is current.

Dr. Doug Beak, U.S. Environmental Protection Agency, Office of Research and Development, National Risk Management Research Laboratory, Robert S. Kerr Environmental Research Center (RSKERC), Ada, OK. Dr. Beak is responsible for assisting in the ground-water sampling. His HAZWOPER certification is current.

Mr. Steve Vandegrift, U.S. Environmental Protection Agency, Office of Research and Development, National Risk Management Research Laboratory, Robert S. Kerr Environmental Research Center (RSKERC), Ada, OK. Mr. Vandegrift is responsible for quality assurance review/approval of the Quality Assurance Project Plan (QAPP), conducting audits, and QA review/approval of the final report. His HAZWOPER certification is current.

Mr. Robert Parker, U.S. Environmental Protection Agency – Region VIII, Denver, CO. Mr. Parker is the CERCLA project manager for the Pavillion investigation and is responsible for overall project coordination between EPA Region VIII and NRMRL-Ada including obtaining access agreements for monitoring well installation and soil-gas sampling. His HAZWOPER certification is current.

Mr. Gregory Oberley, U.S. Environmental Protection Agency - Region VIII, Denver, CO. Mr.

Oberley is responsible for coordinating technical discussion and activities between NRMRL-Ada and EPA Region VIII. His HAZWOPER certification is current.

Mr. Nathan Wiser, U.S. Environmental Protection Agency – Region VIII, Denver, CO. Mr. Wiser is responsible for assisting NRMRL-Ada in selecting locations for ground-water and soil-gas sampling. His HAZWOPER certification is current.

Dr. Sujith Kumar, Shaw Environmental, Ada, OK. Dr. Kumar is responsible for overseeing all contracting and subcontracting of work related to installation of monitoring wells.

Steve Pelphrey, Isotech Laboratories, Inc. Champaign, IL. Mr. Pelphrey is responsible for overseeing the fixed-laboratory analysis of soil-gas samples.

2.2 Lines of Communication Among Project Participants

Dr. DiGiulio is responsible for initiating contact with appropriate project participants as he deems necessary. Other project participants will keep Dr. DiGiulio informed whenever significant developments or changes occur. Lines of communication among project participants may be conducted via in person conversations, electronic mail, phone conversations, conference calls, and periodic meetings.

2.3 Specialized Training or Certificates

HAZWOPER certification is required for on-site work and visits, such as QA audits. Ms. Hargrove is certified to ship "Dangerous Goods" according the U.S. Department of Transportation guidelines and has received training for shipping samples via UPS.

2.4 Process and Responsibilities to Ensure Project Participants Have Current QAPP

Each member of the research team (Dr. Wilkin, Dr. Ross, Dr. Huang, Dr. Beak, Mr. Acree, Mr. Jewell, Ms. Hargrove, Mr. Lankford, Mr. Neill, Mr. Lee) will be provided the most current draft version of the QAPP for comment and will be provided updated versions if the QAPP is modified. The approved QAPP and any subsequent approved revisions shall be provided to those in the Distribution list on cover page. They will typically be distributed electronically via electronic mail. The original QAPP Revision number is "0." Future revisions will be numbered incrementally.

3.0 Scientific Approach

3.1 Ground-Water Monitoring

The ground-water sampling component of this project is intended to provide a survey of water quality in the area of investigation. NRMRL-Ada and EPA Region VIII will survey the area and speak to landowners in late April 2010 to determine the location of monitoring wells. NRMRL-Ada will issue a contract through its on-site contractor, Shaw Inc., to install two deep (e.g., 800'-1000'), designated as *Type A* monitoring wells. Monitoring well installation will occur in June through August 2010. Monitoring wells will be installed in locations where contamination is suspected based on previous sampling of domestic wells by EPA Region VIII. There is a shallower (600') domestic well, near the location of a planned deep monitoring well without a pump, that will be sampled. This is designated as a *Type B* monitoring well. Ground-water

samples may also be collected from domestic wells via homeowner taps. These wells are designated as *Type C* wells. Most domestic wells are screened between 200' - 300' below ground surface. However several domestic wells are shallow (e.g., 60') while others are fairly deep (e.g., 750'). It is anticipated that the monitoring wells will be sampled three times over a period of 1 year. The spacing of the ground-water sampling events will in part depend on weather conditions but is anticipated to start in October 2010 and continue in the spring and fall of 2011. The study area and locations of Type A and B monitoring wells are illustrated in **Figure 1**. The latitude, longitude, and elevation of monitoring wells will be recorded.

3.2 Soil-Gas Survey

A soil-gas survey using the Geoprobe Post Run Tubing (PRT) System with a retractable probe will be conducted in July 2010. The Geoprobe rig will also be used to install approximately 15 dedicated vapor probes at this time. If the weather is favorable, probing will take place at 40 to 50 locations. Probing will be limited to areas where EPA Region VIII has signed access agreements with landowners. This includes most of the area illustrated in **Figure 1**. Probing on property will commence near potential source areas (e.g., pits and production wells) and then proceed radially outward increasing in distance between probed areas with distance from potential source areas. The latitude and longitude of each measurement location will be recorded.

If soil conditions are favorable (e.g., 5 or more meters of unsaturated unconsolidated deposits) oxygen (O₂), CO₂, methane (CH₄), hydrogen (H₂), hydrogen sulfide (H₂S), and total hydrocarbons will be measured at three depths using portable gas analyzers. Otherwise, soilgas will be screened at only one or two depths. Gas permeability will also be measured. Upon attainment of maximum penetration depth (40 to 50') or probe refusal whichever comes first, leak testing will be conducted using a chamber, tracers, and portable gas analyzers.

3.3 Soil-Gas Sampling

Dedicated soil-gas probes installed in July 2010 will be sampled in September, 2010. Leak, purge, and gas permeability testing will precede collection of each soil-gas sample. A sample will not collected if leakage exceeds 10%, a standard used by the State of New York (2006). Samples will be submitted to Isotech Laboratories for analysis of: (1) fixed gases - argon (Ar), helium (He), H₂, O₂, nitrogen (N₂), CO₂; (2) hydrocarbons - CH₄, ethane (C₂H₆), ethylene (C₂H₄), propane (C₃H₈), isobutane (iC₄H₁₀), normal butane (C₄H₁₀), isopentane (iC₅H₁₂), normal pentane (nC₅H₁₂), and hexane plus (C₆+); (3) isotopes - stable isotopes of carbon in CH₄ and CO₂ (δ 13C), stable isotopes of hydrogen in CH₄ (δ D), and radiocarbon isotopes of CH₄ (Δ 14C). A study will be conducted to evaluate the stability of gas concentrations in Cali-5 Bond sampling bags over a 30 day period. This study will be completed prior to collection of soil-gas samples in September 2010.

3.3.a. Rationale for Soil-Gas Sampling Strategy

In an extensive natural gas and petroleum exploration program carried out by the Gulf Oil Research Center between 1972 and 1983, Jones and Drozd (1983) observed that soil-gas measurements can be used to help locate natural gas and petroleum deposits and that soil-gas anomalies of light hydrocarbons often occur along faults and fractures. They also observed similarity between soil-gas and reservoir gas composition. These two observations indicate that transport of hydrocarbon vapors to the vadose zone and thus also to ground water is dominated

by advection through faults and fractures rather than by diffusion through faults, fractures, and structured geologic media. Their observations are consistent with studies in volcanic or geothermal areas where magma degassing, thermo-metamorphic alteration of carbonates, and advective transport through faults and fractures results in high concentrations of CO₂, H₂, He, H₂S, and radon detected in soil-gas and ground water (Azzaro et al., 1998; Baubron et al., 2002; Ciotoli et al., 2007; Fountain and Jacobi, 2000; King et al., 1996; Lewicki and Brantley, 2000; Lewicki et al., 2003). If gas migration is occurring through faults and fractures and by analogy well penetrations in the Pavillion area, soil-gas sampling may be viable and inexpensive method to detect and locate migration pathways. These observations would then be confirmed with similar detection in ground-water samples.

As illustrated in **Figure 2**, soil-gas anomalies generally occur as linear, fault-linked anomalies, as well as in irregularly shaped diffuse or halo anomalies and irregularly spaced plumes or spot anomalies (Ciotoli et al., 1999). Linear anomalies longer than several meters are commonly taken as strong evidence of gas migration along gas-bearing faults (Fridman, 1990; Ciotoli et al., 1998). Most faulted zones are caused by fault intersections and have extensive associated fractures that allow gases to escape laterally and vertically producing halo or diffuse anomalies (Matthews, 1985). Gas emanation from faults is not always continuous (Ciotoli et al., 1998). Multiple spot anomalies occurring along a linear trend may indicate spatially discontinuous gas conduction (Lombardi et al., 1996; Ciotoli et al., 1998). Gas migration through production or abandoned wells would have a spot anomaly near the surface. The ultimate distribution in constituents in soil gas depends on the permeability of rocks, depth of origin, and the influence of near-surface conditions such as ground-water flow, weathering, etc. (Ciotoli et al., 2004). These observations mean that a soil-gas survey must cover a wide area with subsequent refinement in areas of suspected anomalies. This is the strategy that will be employed at Pavillion.

There are a number of potential limitations to using soil-gas sampling to detect leakage or the potential for leakage of CO2 during geologic sequestration and hydrocarbons at Pavillion. Prior to injection of CO2 at a petroleum reservoir for enhanced oil recovery, the reservoir may be underpressurized thereby reducing the driving force for advective transport of hydrocarbons toward the surface. This could limit the use of soil-gas sampling to detect potential migration pathways such as plugged or improperly plugged abandoned wells prior to injection of CO2. Thus, if leakage occurs, detection of migration pathways would occur after rather than before injection. Soil-gas and ground-water monitoring may be necessary near plugged abandoned wells because geophysical logging to ensure well integrity is irrelevant in this case. Given the observation of a highly pressurized natural gas blowout during drilling of a domestic well, this limitation is not a factor at Pavillion. Second, spillage of hydrocarbons near petroleum or natural gas wells could complicate data interpretation (source of hydrocarbons and other gases may be from a near surface source). A vertical gas profile especially in thick unconsolidated unsaturated deposits could help resolve this issue. Third, the presence of multiple confining layers and intervening permeable formations would likely greatly diminish leakage from an abandoned well into a USDW or the vadose zone. For the case of single-fluid flow, Norbotten et al. (2004) conducted simulations to show that for a layered system, leakage from an abandoned well that reached the surface was reduced by orders of magnitude compared to the case of a single thick overlying aguitard due to the availability of permeable layers along the vertical column. Nordbotten et al. (2005a,b) derived a semi-analytical solutions to estimate the radial spread of a plume of injected gas around an injection well and conducted similar simulations. The solutions analyzed the extent of the injected CO2 plume, provided leakage rates through abandoned wells, and estimated the CO₂ plume extent into overlying formations into which the fluid leaks.

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LeNeveu (2008) examined the effect of multiple layers on leakage through a borehole and also showed that in the event of a wellbore leak, a significant amount of the carbon dioxide rising in and around wellbores can dissolve into the formation water above the caprock before reaching the biosphere. Thus, while providing a beneficial effect, the presence of multiple confining layers would significantly reduce the signal to noise ratio for detection of leakage from abandoned wells. This may not be an issue at Pavillion because many production wells are relatively shallow (e.g., less than 1500')

Thus, in general, subsurface conditions at Pavillion indicate that soil-gas sampling should be effective in detecting and determining locations of gas migration into underground sources of drinking water. If gas migration is accompanied by chemicals used for enhanced gas production, soil-gas sampling may be useful in locating areas of chemical intrusion. In regard to chemical migration, the usefulness of this approach needs to be confirmed with the observation of organic compounds and geochemical changes in ground water such as pH, total dissolved solids (TDS) (indirectly measured as specific conductance), oxidation-reduction potential, and element concentrations in addition to changes in stable and radiocarbon isotopic ratios.

3.2.b Selection of Soil-Gas Monitoring Parameters

The following discussion provides a rationale for selection of gases to analyze during soil-gas sampling.

Carbon Dioxide and Oxygen

Depressed levels of O₂ and elevated levels of CO₂ in soil gas can be due to: (1) biodegradation of hydrocarbons from an anthropogenic source (e.g., spillage of petroleum) in the vicinity of measurement, (2) biodegradation of CH₄ and other light hydrocarbons seeping from a petroleum or natural gas reservoir, (3) oxidation of native organic matter in soil, and (4) geochemical reactions in soil and ground water. Since oxidation of organic matter and hydrocarbons is accompanied by reduced O₂ concentration, concentration ratios of CO₂ and O₂ will be used to examine oxidation as a source of CO₂. Observation of increased CO₂ bulk soil gas concentration with depth would indicate migration from ground water or a deeper source as opposed to oxidation from near surface organic matter.

Light Hydrocarbons

Thermogenic light hydrocarbons detected in soil gas typically have a well-defined composition indicative of reservoir composition. The concentration of CH₄, C₂H₆, C₃H₈, and nC₄H₁₀ hydrocarbons almost always occur in the following order: CH₄ > C₂H₆ > C₃H₈ > nC₄H₁₀ (Jones et al., 1999). Methane dominates the light hydrocarbon fraction above natural gas reservoirs whereas significant concentrations of C₂H₆, C₃H₈, and nC₄H₁₀ are found in soil gas overlying petroleum reservoirs. Ratios of light hydrocarbons generally plot as CH₄/C₂H₆ < CH₄/ C₃H₈ < CH₄/nC₅H₁₂ with typical upper limits for dry-gas reservoir ratios of: CH₄/C₂H₆ < 350, CH₄/ C₃H₈ < 900, CH₄/nC₄H₁₀ < 1,500, CH₄/nC₅H₁₂ < 4,500. Biogenic gas and gas from coal bed deposits typically have ratios of CH₄/C₂H₆ that exceed 1000 or 10,000 (Janezic, 1979). Also, C₂H₆, C₃H₈, and nC₄H₁₀ are not produced by biological processes in near surface sediments (Jones and Pirkle, 2009). Only CH₄ and C₂H₄ are products of biodegradation. Thus, elevated levels of CH₄, C₂H₆, C₃H₈, and nC₄H₁₀ in soil gas are indicative of thermogenic origin and serve as natural tracers for natural gas migration from a reservoir.

Hydrogen Sulfide

Hydrogen sulfide is produced during the anaerobic decomposition of organic matter by sulfur bacteria. It is also found in varying amounts in unrefined natural gas and petroleum, in sulfur deposits, volcanic gases and sulfur springs. Thus H₂S may serve as a natural tracer for natural gas migration.

Hydrogen and Helium

Because H₂ and He are chemically inert, physically stable, and highly insoluble in water, they are widely recognized as good fault and fracture indicators (Klusman, 1993; Ciotoli et al., 1999; Ciotoli et al., 2004). Helium and H₂ have been observed in soil gas at values up to 430 and 50 ppmv respectively over the San Andreas fault in California (Jones and Pirkle, 1981). Wakita et al. (1978) observed He at a maximum concentration of 350 ppmv along a nitrogen vent in Japan. Wakita et al. (1980) reported hydrogen anomalies ranging from 2 to 30,000 ppmv H₂ along the Yamasaki fault zone in Japan with ambient background values of 0.5 ppmv observed outside the influence of the fault. The atmospheric concentration of helium is 5220 ± 15 ppbv.

The presence of He in soil gas is often independent of the oil and gas deposits. However, since He is more soluble in oil than water, it is frequently found at elevated concentrations in soil gas above natural gas and petroleum reservoirs and hence may serve as a natural tracer for gas migration.

Carbon and Hydrogen Isotopes

Carbon and hydrogen isotope analysis is very useful in determining the origin of CH_4 , other light hydrocarbons, and CO_2 in soil gas. Isotopes are reported as the relative difference in the ratio of the less abundant heavier isotope to the more abundant lighter isotope of the sample with respect to a reference standard. Ratios are expressed in parts per thousand or permil (‰). Stable carbon isotope analysis of δ 13C is defined as:

$$\delta 13C(\%) = \left[\frac{\binom{13}{C}\binom{12}{C}\text{sampled}}{\binom{13}{C}\binom{12}{C}\text{standard}} - 1 \right] \times 1000$$

where the standard is the Pee Dee Belemnite (PDB) reference standard. Δ14C is defined as:

$$\Delta 14C(\%) = \left(\frac{\binom{14}{C}\binom{12}{C}\text{ sample}}{\binom{14}{C}\binom{12}{C}\text{ standard}} - 1\right) \times 1000.$$

The reference standard is oxalic acid decay corrected to 1950. δD is defined as

$$\delta D(\%o) = \left[\frac{(^{2}H/^{1}H)sampled}{(^{2}H/^{1}H)standard} - 1 \right] \times 1000$$

where the standard is the Vienna Standard Mean Ocean Water Standard.

Baldassare and Laughrey (1997), Schoell (1980, 1983), Kaplan (1997), Rowe and Muehlenbachs (1999), and others have summarized interpretation of values of δ 13C and δ D for CH₄. As illustrated in **Figure 3**, it is often possible to distinguish CH₄ formed from microbial and thermogenic processes by plotting δ 13C for CH₄ versus δ D for CH₄. For CH₄ found in near-surface environments due to acetate fermentation (marsh gas and landfill gas), values of δ 13C for CH₄ range from -40 to -62‰ and values of δ D for CH₄ range from 270 to -350‰. For outwash deposits, values of δ 13C for CH₄ range from -62 to -90‰ and values of δ D for CH₄ range from about -180 to -240‰. For CH₄ of thermogenic origin, values of δ 13C for CH₄ range from -28 to -60‰ and values of δ D for CH₄ range -110 to -250‰. Values of δ 13Cfor CH₄ near -60‰ associated with values of δ D for CH₄ in the -160 to -260‰ range are attributed to mixing of thermogenic and microbial methane.

Since radiocarbon has a half-life of 5730 years, ancient organic matter and fossil fuels such as natural gas are ¹⁴C-free meaning that undiluted thermogenic CH₄ or CO₂ from degradation of thermogenic CH₄ will have a value of Δ14C near -1000‰.

4.0 Sampling Procedures

Samples will be retained by the laboratories until the principal investigators five permission for disposal.

4.1 Ground-Water Sampling

4.1.a Background Hydrogeological Information

The USGS published a report entitled "Monitoring-Well Network and Sampling Design for Ground-Water Quality, Wind River Indian Reservation, Wyoming (2005)" which could be helpful in discerning background hydrogeological conditions. As illustrated in Figure 4, hydrostratigraphy in the area can be divided into local Quaternary age aquifers, 10 bedrock aquifers, and 11 confining layers. Quaternary age media include alluvium, colluvium, eolian, terrace, pediment, landslide, glacial, and travertine deposits. Quaternary age deposits are generally less than 50 ft thick yield 2 to 60 gallons per minute (gal/min), and have dissolvedsolids concentrations range from 109 to 4,630 milligrams per liter (mg/L). Tertiary age deposits include the Wind River, Fort Union, and Indian Meadows Formations. In the Wind River basin trough, the Wind River and Fort Union have combined thickness in excess of 10,000 ft. However, thickness varies greatly throughout the basin. The Indian Meadows Formation lies between the Wind River and Fort Union Formations, but it is not differentiated in the subsurface of the Wind River Structural Basin. Water yields from wells in the Wind River Formation range from 0.1 to 350 gal/min, and dissolved-solids concentrations range from 211 to 5,110 mg/L. These large ranges result in part from the varied lithology of the formation. Tertiary volcaniclastic rocks of the Wiggins, Tepee Trail, and Aycross Formations occur above the Wind River Formation. Water quality samples collected from springs discharging from volcaniclastic rocks have dissolved-solids concentrations ranging from 197 to 244 mg/L. Discharges from the springs range from 8 to 37 gal/min. At depths of greater than a few thousand feet it is likely that the water from Tertiary aquifers is highly saline (dissolved-solids concentrations between 10,000 and 35,000 mg/L) to briny (dissolved-solids concentrations greater than 35,000 mg/L). Mesozoic rocks consist mostly of siltstone, sandstone, and shale. Smaller amounts of claystone, conglomerate, coal, bentonite, limestone, dolomite, and gypsum also are present. These rocks are overlain by thick Tertiary deposits, except near the flanks of the mountains and around

some of the structures in the basin. Water yields from wells in Mesozoic aquifers range from 0.5 to 90 gal/min, and dissolved-solids concentrations range from 182 to 6,060 mg/L. In general, the median values for dissolved-solids concentrations in the water samples from Mesozoic aquifers are about 1,000 mg/L, except in water samples from the Cody Shale, which has a median value of 2,540 mg/L. It is likely that most of the water samples from Mesozoic aquifers evaluated came from relatively shallow depths near recharge areas. Away from these areas, water from Mesozoic aquifers probably is saline to briny. Paleozoic rocks are composed mostly of sandstone, shale, limestone, and dolomite, with some chert. Well-yield and water-quality records are sparse for Paleozoic aquifers. Dissolved solids in Paleozoic aquifers range from less than 500 mg/L to more than 3,000 mg/L. Most of these water-quality samples probably came from shallow depths (less than a few thousand feet). In the central basin area where these rocks are deeply buried, the dissolved-solids content is probably much greater.

4.1.b Installation of Monitoring Wells

NRMRL-Ada's on-site contractor, Shaw Inc., will be tasked with drilling and installation of two deep monitoring well wells. A local driller, Mr. Louis Dickinson, states that a highly productive white coarse-grained sandstone aquifer exists at 800 - 1000' below ground surface in this area. The goal of drilling is to place monitoring wells in this deposit which is part of the Wind River Formation. An interview was conducted with Mr. Dickinson, to determine stratigraphy around and within the area of deep monitoring well installation. Domestic wells in the area were drilled with mud rotary. One deep well will be drilled on the (b) (6) property and the other well will be drilled on the (b) (6) property. In December 2005, Mr. Dickinson was contracted to drill a domestic well to replace an existing well screened at 210' on a property adjacent (0.5 miles east-northeast) to the (b) (6) property owned by Luis Meeks. Mr. Meeks complained of "petroleum-like" odors and taste associated with the water. While drilling the well, Mr. Dickinson recorded deposits as a function of depth outlined below.

Depth (ft)	Deposit and the second
0 - 15	top soil
15 - 75	brown sandstone
75 - 90	gray coarse-grained sandstone
90 - 140	red and green claystone
170 - 195	gray shale
195 - 210	gray fine-grained sandstone
210 - 445	gray shale
445 - 460	gray fine-grained sandstone
460 - 520	gray shale
520 - 540	gray medium-grained sandstone
540 - 550	gray shale

Mr. Dickinson states that while developing the well to remove drilling mud, a methane gas blowout occurred on 12/19/05. The well was shut-in on 12/22/05. When the well was shut-in, a significant increase in gas production was noted in production well 14-2. Mr. Meeks states that he began smelling gas at 160 - 180' during drilling.

Another deep monitoring well will be located on the (6) (6) property. Dr. Dickinson installed a deep domestic well in a nearby location and recorded deposits as a function of depth outlined below.

Depth (ft)	<u>Deposit</u>
0 - 70	brown coarse-grained sandstone
70 - 170	gray shale
170 - 205	gray medium-grained sandstone
205 - 245	gray shale
245 - 335	gray medium-grained sandstone
335 - 420	gray shale
420 - 520	gray medium-grained sandstone
520 - 575	gray shale
575 - 595	gray fine-grained sandstone
595 - 840	gray shale
840 - 850	red and green claystone
850 - 875	white coarse-grained sandstone
875 - 940	red claystone
940 - 1000	green claystone
1000 - 1050	white coarse-grained sandstone
1050 - 1060	green claystone

Monitoring well installation will occur in June through August 2010. Drilling and installation of deep wells will require the use of blowout protection (BOP) to ensure the safety of workers and prevent potential loss of commodity (natural gas). BOP is common when drilling in fields containing natural gas.

Shaw Inc. will provide the following tasks to support for drilling and monitoring well installation.

- Explore both the feasibility and cost of drilling deep wells using methods that include rotosonic, air rotary with casing advance, water rotary, and mud rotary.
- Compile a list of drillers capable of installing deep monitoring wells with BOP. This list
 does not have to be limited to the State of Wyoming. Since this is a CERCLA
 investigation, drilling permits are not required.
- Explore the costs associated with continuous coring of deep wells versus coring only screened intervals (20' for deep wells), versus no coring (just cuttings).
- Provide a geologist to log cuttings and/or core material during drilling.
- Provide a cost estimate for open hole logging of one or more deep wells during drilling.
 The primary purpose of logging is to assist in identification of lithology. Methods to consider include resistivity and density logging.
- Determine well screen and casing materials to ensure a minimum internal diameter of 4 inches. A 20 foot screen will be used for deep wells. The screen will be placed in the white coarse-grained sandstone.
- Survey the location and elevation of casing.
- Dispose of drilling cuttings including muds and drilling fluids as required by State law.
 Shaw may need to sample and analyze fluids as part of disposal.

- Develop monitoring wells and dispose of purge water as required by State law. Wells will
 be developed until the following conditions are met;
 - < 10 NTU</p>
 - minimum of 3 purge volumes even if < 10 NTU if obtained prior to attainment of 3 purge volumes
 - attainment of at least 5 purge volumes if < 10 NTU is not achieved after 3 purge volumes.
- Ensure that drilling does not occur near buried utility lines. In the event that a buried line is punctured, the Contractor will be responsible for contacting the relevant utility company and repair of a utility line if necessary.

Shaw Inc. will develop a separate QAPP for drilling which will be reviewed independently of this document. Shaw Inc. will report on the completion of all TDs in the form of a letter, memo, or other written correspondence to completely address the particular work request. Such documentation shall be addressed to the PO/WAM. This documentation shall reference the TD number, the method(s) used, and comments on any problems or specifics.

Monitoring wells may be located within 100 feet of an existing production well. Wells however will be located off paved roads and on domestic property where EPA Region VIII has gained access. Expansion or improvement of roads will not be necessary to drill. There are no cultural sites or endangered species to be protected. There are no natural features (e.g., streams) that will need protection.

4.1.c Ground-Water Monitoring

A dedicated submersible pump (4-inch Franklin Electric 3HP) will be used to sample water from the two, deep Type A wells. The pump intake in both wells will be placed at the top of the 20-foot screened interval. A bomb sampler (**Figure 5**) will be used to sample water from the Type B monitoring well in order to insure that a representative sample is collected for pressure—sensitive dissolved gas analyses. In this way a comparison will be made of dissolved gas concentrations in ground water from the Type B well between samples in which pressure is maintained (using bomb sampler) and samples collected at ambient pressure. The bomb sampler will be deployed following well purging.

The following methodology will be used for the Type A monitoring wells.

- 1) The dedicated pump will be powered on. It is expected that the pump will yield an initial flow rate of approximately 3-5 gallons per minute (11 to 19 L/m). This total flow will be split, with one portion going to waste and the other portion will be valved through a flow cell equipped with a YSI 5600 multiparameter probe. The rate of pumping will be determined by measuring the water volume collected after approximately 15 seconds into a 4 L graduated cylinder; the desirable pumping rate through the flow cell should be less than 2 L/min. The pumping rate will ideally maintain minimal drawdown. Drawdown will be manually monitored using a Solinst Model 101 water level indicator before sampling and at a minimum of every 30 minutes during well purging.
- 2) The YSI probe will be used to track the stabilization of pH, oxidation-reduction potential (ORP), specific conductance (SC), dissolved oxygen (DO), and temperature. In general, the following guidelines will be used to determine when parameters have stabilized: pH changes <0.02 standard units per minute, ORP changes <2 mV per minute, and specific</p>

- conductance changes <1% per minute. These criteria are initial guidelines; professional judgment in the field will be used to determine on a well-by-well basis when stabilization occurs.
- 3) Once stabilization occurs, the final values for pH, ORP, specific conductance, dissolved oxygen, and temperature will be recorded. The amount of purge water necessary to achieve stabilization will be measured by recording the volume within the waste tank prior to and at the end of pumping and taking the difference. This volume will be determined on a well-by-well basis and used for subsequent sampling activities. At a minimum, however, a volume equivalent to 3-screen volumes will be pumped. For a 4-inch diameter well with a 20-foot screen, this is equivalent to 39 gallons of ground water.
- 4) After the values for pH, ORP, SC, DO, and temperature have been recorded, the flow cell will be disconnected. A series of unfiltered samples will be collected as follows:
 - a. Triplicate 1 L samples (amber glass) and duplicate 20 mL vials (amber glass) will be collected for the Region 8 EPA lab. No preservative will be added to these samples for trace organic analyses. The samples will be stored and shipped on ice to the Denver (CO) facility for GC-MS analysis.
 - b. Duplicate 60 mL serum bottles will be collected for dissolved gas analysis (e.g., hydrogen, carbon dioxide, ethane, methane, butane, propane). The bottles will contain trisodium phosphate as a preservative and will be filled with no head space and sealed with a crimp cap.
 - c. A 1 L plastic bottle containing a caplet of benzalkonium chloride will be filled and sealed and shipped to Isotech for δ^{13} C of C1-C5 dissolved gases and δ^{2} H of methane.
 - d. A 1-liter plastic beaker will be filled for selected analyses to be conducted in the field. Field measurements will consist of alkalinity, ferrous iron, and dissolved sulfide. Alkalinity will be measured by titrating ground water with 1.6N H₂SO₄ to the bromcresol green-methyl red endpoint using a HACH titrator (HACH method 8203, equivalent to Standard Method 2320B for alkalinity). Ferrous iron will be measured using the 1,10-phenanthroline colorimetric method (HACH DR/2010 spectrometer, HACH method 8146, equivalent to Standard Method 3500-Fe B for wastewater). Dissolved sulfide will be measured using the methylene blue colorimetric method (HACH DR/2010 spectrometer; HACH method 8131, equivalent to Standard Method 4500-S²⁻ D for wastewater).
 - f. A summary of QA/QC requirements from SOPs and ground-water sampling details are provided in Tables 2 and 3.
- 5) After the unfiltered samples have been collected a 4 L capacity vessel will be filled up with ground water. A peristaltic pump (Geopump) will be used pump water from the vessel through teflon-lined polyethylene tubing and through high-capacity ground-water filters into pre-labeled sample bottles. First, approximately 100 mL of ground water will be filtered and sent to waste and next the following series of samples will be collected:
 - a. 125 mL plastic bottle for metals analysis by ICP-OES for AI, Ag, As, B, Be, Ba, Ca, Cd, Co, Cr, Cu, Fe, K, Mg, Mn, Mo, Na, Ni, Pb, Sb, Se, Sr, Ti, TI, V, Zn, Si, and S; this sample will also be used for ICP-MS analysis for Cd, Cr, As, Cu, Pb, Ni, Se, Hg, and TI. This sample will be filtered and preserved by adding 5 drops of concentrated HNO₃ (pH test strips will be used to confirm that the sample pH is <2). Test strips for pH will be used on every sample to insure that a proper preservation pH is attained. This is especially important in case high alkalinity samples are encountered during the ground-water sampling.</p>

- b. 30 mL amber plastic bottle for LC-ICP-MS analysis of arsenic speciation. The method of preservation for this sample will depend on the result of the dissolved sulfide measurement (step 4d above). If the dissolved sulfide concentration is <0.1 mg/L, then the sample will be preserved with 2 drops of concentrated hydrochloric acid (pH test strips will be used to confirm that the sample pH is <2; see note above regarding use of pH test strips). If the dissolved sulfide concentration is >0.1 mg/L, then no acid will be added. The sample will be stored and transported on ice.
- c. 30 mL clear plastic bottle for CE (capillary electrophoresis) sulfate, chloride, and fluoride. This sample will be filtered, no preservative added.
- d. 30 mL clear plastic bottle for FIA (flow injection analysis) for nitrate + nitrite and ammonium. This sample will be filtered, 2 drops of sulfuric acid added as preservative (pH test strips will be used to confirm that the sample pH is <2; see note above regarding use of pH test strips).
- e. 45 mL glass VOA vial in duplicate for analysis of dissolved inorganic carbon (DIC) and dissolved organic carbon (DOC). This sample will be filtered, no preservative added.
- f. 60 mL plastic bottle for analysis of δ^{13} C of dissolved inorganic carbon. This sample will be filtered, no preservative added. Samples will be shipped on ice to Isotech Laboratories for isotopic analyses.
- g. 20 mL glass VOA vial for analysis of δ^{18} O and δ^{2} H of water using IRMS. This sample will be filtered, no preservative added.

Unless noted otherwise above, ground-water samples will be submitted to Shaw, NRMRL-Ada's on-site contractor, and the EPA General Parameters (GP) Laboratory, for fixed-laboratory analysis. Specific samples will be delivered to the Region 8 analytical facility or to Isotech Laboratories for isotopic analyses of dissolved inorganic carbon and dissolved gases.

The following methodology will be used for the Type B monitoring well located on the Locker property.

- Since the screen length is not known for this well, a caliper log will be conducted to ascertain the depth interval over which the casing is open. This is a 6-inch diameter well. Based upon the screen length, a calculation of 3-screen volumes will be made to determine a minimum pumping volume.
- 2) An Idronaut Ocean Seven 303 CTD Multiparameter Probe will be lowered down the well casing using a logging truck. The probe will be positioned approximately at the top of the screened interval of the well. The multiparameter probe will record geochemical parameters of interest, such as pH, oxidation-reduction potential, specific conductivity, dissolved oxygen concentration, and temperature. As a contingency plan, a Century Geophysical Corporation E-log tool (model number 7044) will be used as a downhole probe to measure and track the stabilization of specific conductance and temperature.
- 3) Next, a Grundfos Redi-Flo2 (stainless steel) pump will be positioned in the monitoring well approximately 20 feet below the ambient ground-water level. Either a portable Honda EM2500 watt generator or equivalent generator will be used to power the pump. Polyethylene tubing will be used (OD=0.500 inch, ID=0.375 inch). Alternatively polyethylene tubing of OD 0.625 inch and ID 0.500 inch may be used. The initial expected pumping rate is 10 L/min; the higher pumping rate is needed because this is a 6-inch diameter well. The rate of pumping will be determined by

- measuring the water volume collected after approximately 15 seconds into a 4 L graduated cylinder. Drawdown in the well will be manually monitored using a Solinst Model 101 water level indicator before sampling and at a minimum frequency of once every 30 minutes during pumping.
- 4) Once pumping of ground water is initiated, geochemical parameters acquired with the multiparameter probe or the specific conductance probe will be monitored for stabilization. Geochemical parameters will be used to track and establish when representative formation water is accessed by the downhole probe. In general, the following guidelines will be used to determine when parameters have stabilized: pH changes <0.02 standard units per minute, ORP changes <2 mV per minute, and specific conductance changes <1% per minute. As noted before, these criteria are initial guidelines, and professional judgment in the field will be used to determine on a well-by-well basis when stabilization occurs.
- 5) Once stabilization occurs, the final values for pH, ORP, specific conductance, dissolved oxygen, and temperature will be recorded. The amount of purge water necessary to achieve stabilization will be measured from the accumulated volume in the waste container. The downhole probes (Idronaut or Century Geophysical Corporation E-log tool) are designed for use in deep sea or deep subsurface investigations. The probes are designed to provide accurate readouts at high pressure.
- 6) Next the Idronaut multiparameter probe or conductance probe and the pump will be retrieved from the well. The logging trailer will be used to lower the bomb sampler (Century Geophysical Corporation Fluid Sampler, 1 liter, 303 SS, model # 9751 plus a series of 304 SS vessels; Figure 5) through the well opening and to the desired depth within the screened interval. A series of valves will be used to attach 500 mL vessels and two 150 mL stainless steel sampling vessels (Swagelok, 150 mL, 304L SS, part #304L-HDF4-50a). This series of sampling vessels will used to collect ground water in one sampling pass, including pressurized samples for dissolved gas analyses. The pump will again be lowered to the same depth and the volume of water determined to attain stabilization will again be pumped. At that time, the bomb sampler will be activated from the surface and ground water will fill the bomb sampler and attached sample vessels. The downhole valve on the bomb sampler will be closed and next, the pump and sampling apparatus will be pulled from the well.
- 7) Each time the bomb sampler is deployed downhole, where duplicate or multiple samples are required, the monitoring wells will be re-purged to assure that representative formation water is acquired in the downhole sampler.

Once at the surface, the duplicate 150 mL sample vessels for dissolved gas analysis will be detached. The vessels will be stored on ice and returned to Shaw, NRMRL-Ada's on-site contractor, for fixed-laboratory analysis. Shaw will measure dissolved gases in these samples (carbon dioxide, methane, ethane, propane, butane, and acetylene). Each time this well is sampled, separate 150 mL vessels will be used. These samples will not be acid preserved; therefore, lack of acid preservation will be noted on sample log-in sheets and on the final analytical report of concentration data.

Pressure-insensitive samples will be collected after first expelling the contents of the 1 L plus attached series of 500 mL vessels into a plastic reservoir. A peristaltic pump (Geopump) will be used to pump water from the reservoir through teflon-lined polyethylene tubing into pre-labeled sample bottles. The following samples will be collected:

- a) 1 L sample (amber glass bottle) and duplicate 20 mL samples (amber VOA vials) will be collected for the Region 8 EPA lab. No preservative will be added to the samples. The samples will be stored and shipped on ice to the Denver (CO) facility for GC-MS analysis. These samples will not be filtered.
- b) A 200 mL unfiltered sample will be collected for field measurements. Field measurements will consist of alkalinity, ferrous iron, and dissolved sulfide. Alkalinity will be measured by titrating ground water with 1.6N H₂SO₄ to the bromcresol green-methyl red endpoint using a HACH titrator (HACH method 8203, equivalent to Standard Method 2320B for alkalinity). Ferrous iron will be measured using the 1,10-phenanthroline colorimetric method (HACH DR/2010 spectrometer, HACH method 8146, equivalent to Standard Method 3500-Fe B for wastewater). Dissolved sulfide will be measured using the methylene blue colorimetric method (HACH DR/2010 spectrometer; 1)HACH method 8131, equivalent to Standard Method 4500-S²⁻ D for wastewater). A portion of this sample will also be used to measure pH, specific conductance, ORP, and dissolved oxygen using the YSI meter and multiparmater probe.
- c) Two 60 mL serum bottles will be filled with unfiltered water for dissolved gas analysis. One serum bottle will be unpreserved and the other bottle will be preserved with trisodium phosphate.
- d) Next a high-capacity filter will be attached to the tubing and a series of filtered samples will be collected following wasting 100 mL through the filter.
- e) 125 mL plastic bottle for metals analysis by ICP-OES for Al, Ag, As, B, Be, Ba, Ca, Cd, Co, Cr, Cu, Fe, K, Mg, Mn, Mo, Na, Ni, Pb, Sb, Se, Sr, Ti, Tl, V, Zn, Si, and S; this sample will also be used for ICP-MS analysis for Cd, Cr, As, Cu, Pb, Ni, Se, Hg, and Tl. This sample will be filtered and preserved by adding 5 drops of concentrated HNO₃ (pH test strips will be used to confirm that the sample pH is <2). Test strips for pH will be used on every sample to insure that a proper preservation pH is attained. This is especially important in case high alkalinity samples are encountered during the groundwater sampling.
- f) 30 mL amber plastic bottle for LC-ICP-MS analysis of arsenic speciation. The method of preservation for this sample will depend on the result of the dissolved sulfide measurement (step 4d above). If the dissolved sulfide concentration is <0.1 mg/L, then the This sample will be filtered and preserved with 2 drops of concentrated hydrochloric acid (pH test strips will be used to confirm that the sample pH is <2; see note above regarding use of pH test strips). If the dissolved sulfide concentration is >0.1 mg/L, then no acid will be added. The sample will be stored and transported on ice.
- g) 30 mL clear plastic bottle for CE (capillary electrophoresis) sulfate, chloride, and fluoride. This sample will be filtered, no preservative added.
- h) 30 mL clear plastic bottle for FIA (flow injection analysis) for nitrate + nitrite and ammonium. This sample will be filtered, sulfuric acid added as preservative.
- 45 mL glass VOA vial in duplicate for analysis of dissolved inorganic carbon (DIC) and dissolved organic carbon (DOC). This sample will be filtered, no preservative added.
- j) 20 mL glass VOA vial for analysis of δ^{18} O and δ^{2} H of water using IRMS. This sample will be filtered, no preservative added.
- k) 60 mL plastic bottle for analysis of δ^{13} C of dissolved inorganic carbon. This sample will be filtered, no preservative added. Samples will be shipped on ice to Isotech Laboratories for isotopic analyses.
- I) The ground water remaining in the reservoir will be emptied unfiltered into a plastic bottle supplied by Isotech. The bottle will contain a caplet of benzalkonium chloride and will be submitted for analysis of δ^{13} C of C1-C5 dissolved gases and δ^{2} H of methane. The bottle will be stored and shipped upside down to prevent gas loss from the container.

- m) Unless noted otherwise above, ground-water samples will be submitted to Shaw, NRMRL-Ada's on-site contractor, and the EPA General Parameters (GP) Laboratory, for fixed-laboratory analysis. Specific samples will be delivered to the Region 8 analytical facility or to Isotech Laboratories for isotopic analyses of dissolved inorganic carbon.
- n) A summary of QA/QC requirements from SOPs and ground-water sampling details are provided in Tables 2 and 3.

Type C ground-water samples will be collected from selected taps of local homeowners. These samples will not be filtered. Samples will be poured directly into sample containers as noted above with the exception of samples for dissolved gas analyses in which water samples will be collected into 60 mL glass serum bottles with crimp cap seals. The samples will be collected with no head space. To facilitate comparison of data between Type A, B, and C ground-water samples, these dissolved-gas samples will collected in duplicate, one sample unpreserved and the other preserved with trisodium phosphate. It is understood that samples from Type C wells (and Type A wells) may be subject to degassing as they are pumped to the surface, leading to sample results that are probably not as representative as those taken with the sample bombs. Field measurements will also consist of alkalinity, ferrous iron, and dissolved sulfide. In addition, pH, ORP, specific conductance, dissolved oxygen, and temperature will be measured with a YSI Model 5600 multiparameter probe. Water from the taps will be run until these parameters stabilize following the criteria described in section 3.1. Duplicate samples will collected at a frequency of one in every 5 taps sampled. Two bottles for each parameter to be measured will be collected at the same time.

4.1.d Ground-Water Sample Collection

As part of this study, techniques are being developed to acquire representative samples from deep ground-water monitoring wells. The method described allows for sampling after the ground water flow regime in the vicinity of the monitoring well stabilizes, as in the standard low-flow sampling technique for minimal drawdown and minimal well disturbance. A downhole water quality indicator device (e.g., pH, specific conductance, ORP, dissolved oxygen) will be used to establish the extraction volume for sample collection. Most samples will be filtered with a high-capacity ground water filter. Samples for metals analysis by ICP-OES and ICP-MS will be collected into 125 mL clear plastic bottles and acidified to pH<2 with nitric acid (Optima). Samples for As speciation will be collected into 30 mL amber plastic bottles and acidified to pH<2 with hydrochloric acid (Optima). Samples for anion analysis will be collected into 30 mL clear plastic bottles. Samples for carbon analysis (concentrations and stable isotope analysis) will be collected into 45 mL glass bottles or 60 mL plastic bottles. Samples for O and H stable isotope analysis of water will be collected into 20 mL VOA vials. Samples for dissolved gas analysis will be collected into 150 mL stainless steel vessels (Type B wells) or 60 mL serum bottles with crimp cap seals (Type A and C wells).

Holding times for all analyses are specified in **Table 2**. Holding parameters have not been determined by IsoTech for the carbon isotope measurements. This topic is outside of the scope of the current study, so these data will be flagged as qualitative. The minimum concentration of DIC and methane necessary for isotope measurements are 100 mg/L and 1 mg/L, respectively. All samples will be placed on ice immediately after collection and kept chilled until return to the laboratory. Duplicate samples will be collected on an average of every 5 ground-water wells sampled. Duplicates will be handled in an identical manner to the primary ground-water samples; separate bomb samples will be retrieved in order to collect duplicate samples. Every sample for analysis will be collected in duplicate. On every day of ground-water sampling

campaigns, a blank sample will be collected using distilled water to evaluate contamination from the sampling equipment. The equipment blank will be distilled water poured into the 1 L bomb sampler, emptied into the plastic beaker, and then pumped into sampling bottles. At the same time a source blank will be prepared by pouring deionized water directly into the sampling bottles.

Multiparameter probes used for the measurement of pH, ORP, specific conductance, and dissolved oxygen will be calibrated or checked in the field prior to use following the recommendations provided by the equipment manufacturers. The pH electrode will be calibrated using a three-point calibration wth pH 4, pH 7, and 10 buffers. The ORP electrode will be checked by measuring an ORION ORP standard solution (200 ± 20 mV). The specific conductance electrode will be checked with a 1413 uS/cm standard solution (1413 uS/cm ±5%). The dissolved oxygen sensor will be calibrated to 100% atmospheric oxygen saturation. The electrode will be checked by reading a zero-oxygen solution. Performance of the pH probes will be checked at mid-day and the end of each day by measuring and recording the pH of a pH 7 (± 0.1 standard units) buffer solution. The other probes shall be checked as well with criteria noted earlier in the paragraph).

Decontamination procedures will be used on the bomb sampler, pump and tubing, plastic reservoirs used for holding ground water, and the multiparameter probes. Note whenever possible, new tubing and plasticware will be used when moving to new sampling locations. After the completion of sampling activities at a well, the bomb sampler will be given an Alconox scrub and wash, followed by 2 potable water rinses, followed by 1 rinse with distilled water. The pump (non-submersible) and tubing used in the well will be cleaned by circulating 2 gallons of Alconox solution through the pump for 5 minutes, followed by a potable water recirculation for 5 minutes, followed by a 5 minute recirculation with distilled water. The multiparameter probe will be rinsed with potable water followed by a rinse with distilled water. Multiple sampling assemblies will be available to minimize the amount of decontamination required, i.e., cleaned vessels will be on-hand in the field. Any pump tubing used with the peristaltic pump for sample filtration will be discarded and replaced for each new well sampled.

4.1.e Ground-Water Sampling Labeling

Each well will be uniquely labeled. Samples collected from each well will include the unique label, the date, the initials of the sampler, and designation of the sample type, e.g., "metals". This information will be recorded onto labeling tape, using water-insoluble ink, affixed to each sample bottle.

4.1.f Ground-Water Sample Packing and Shipping

Samples collected from each well will placed together in a sealed Ziploc plastic bag. The bags will be placed on ice in coolers. Glass bottles will be packed with bubble wrap to prevent breakage. The coolers will be sent via UPS, overnight, to the appropriate lab with chain of custody forms (see **Figure 7**) and custody seal.

R.S. Kerr Environmental Research Center
919 Kerr Research Drive
Ada, OK 74820
1-580-436-8920
ATTN: Andrew Greenwood

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(for samples analyzed by both Shaw and EPA General Parameters Laboratory)

Isotech Laboratories, Inc. 1308 Parkland Court Champaign, IL 61821 1-817-362-4190 ATTN: Steve Pelphrey

4.2 Soil-Gas Sampling

Prior to conducting the soil-gas survey, EPA Region VIII will contact landowners and prepare access agreements prior to selection of sampling locations. EPA Region VIII will also contact EnCana, owner of petroleum and natural gas wells, to request the presence of a representative during soil-gas sample location selection to ensure that probing does not occur near buried gas pipelines. Based on discussion with homeowners, NRMRL-Ada personnel will mark off additional areas around homes or on land owned by homeowners that should be avoided during probing. Prior to probing, NRMRL-Ada personnel will contact utility companies to review procedures to follow in the unlikely event that a buried utility line is damaged or severed.

4.2.a Geoprobe Post Run Tubing System (PRT)

An area-wide soil-gas survey will be conducted using the Geoprobe PRT system. A retractable probe and connecting rods will be pushed vertically into the ground until the desired depth is reached. The probe rods will be retracted approximately 6 cm. A metal rod will be used to extend the retractable probe to its full length. The probe creates a 2.5 cm (1") diameter, borehole upon retraction. A PRT adapter with low density polyethylene tubing (0.43 cm x 0.64 cm) will be inserted into the probe rods and turned counterclockwise to engage the adapter threads and an O-ring with the point holder. The tubing will be pulled up lightly to test engagement of the threads. The sample is drawn through the point holder, the adapter, and sample tubing. Since the retraction length is 6 cm (2.25") and the diameter of the retraction tube is 0.95 cm (3/8"), the interval volume of the open portion of the hole is approximated by 25 cm³. The point holder adds another 24 cm³ of internal volume. If 0.47 cm (3/16") internal diameter low density polyethylene tubing is used to connect the PRT adapter, the internal volume of tubing = 0.15 * length of tubing (cm³). The tubing will be replaced after each sample eliminating sample carryover problems and the need to decontaminate the probe rods.

4.2.b Installation of Dedicated Soil-Gas Probes

Prior to probing in a "new" (e.g., different property owner, near bedrock outcrop) area, an exploratory borehole will be cored to determine depth to water and variation of soil texture with depth. To create a borehole, a Geoprobe® rig will be used to push and extract 2.25" O.D. 4' long steel Geoprobe® macrocore (MC) samplers to 3' below the water table surface or refusal whichever comes first. Each sampler will contain a 4' long clear polyvinylchloride (PVC) liner to collect soil cores. A MC core catcher will be used with each liner to avoid loss of soil during retrieval. Each core will be sliced open for manual inspection. Soil texture will be determined using the Natural Resources Conservation Service Guide to Texture by Feel modified from S.J. Thien (1979).

It is expected that the water table will be very shallow (less than 5') in some areas, so soil-gas probes will be constructed using a 5' section of schedule-40 PVC 1" I.D. slotted screen and riser

pipe. The screen will be set across the water table. This will allow measurement of depth to the water table prior to gas extraction to avoid extraction of water during soil-gas sampling. The probes will be sealed and locked using commercially available expandable well caps to ensure a gas-tight seal. All casing materials will be connected without use of solvents, glues, or materials which would induce contamination into the wells. O-rings will be placed between sections of riser pipe to ensure that the casing was water- and gas-tight.

The sandpack will extend 0.5' below and 0.5' above the screened interval. A 0.5' layer of bentonite chips will be placed above the sandpack to prevent intrusion of grout into the sandpack. A grout tremie pipe will be used to pump a bentonite slurry to the base of the rod string using a stainless-steel rod and 3/8" tubing to create an impervious watertight bond between the casing and the undisturbed formation surrounding the casing. The bentonite grout will extend to within 30.5 cm (1') of the surface. Probes will be encased in a 20.3 cm (8") diameter bolted metal box at the surface to protect the probes from surface traffic.

4.2.c Soil-Gas Sample Train

Leak, purge, and gas permeability testing will accompany each soil-gas sample collected from dedicated soil-gas probes for fixed laboratory analysis using a 36 cm (14") diameter 25 cm high (10") stainless-steel chamber designed at GWERD. A photograph of the soil-gas sample train is provided in **Figure 8**. Barbed brass 6.35 mm (1/4") fittings are used to inject and monitor a tracer gas mixture. Masterflex® Viton L/S 6.35 mm internal diameter tubing is used to connect the brass fitting used for injection to a 150-mm Cole-Parmer variable area flow meter (0 – 29 LPM) with a needle valve and to a pressurized canister of tracer gas mixture. Viton tubing is used to direct the tracer gas mixture inside or directly above a borehole or PRT tubing to maximize and monitor tracer concentration at potential location(s) of leakage during leak testing. Viton tubing is used to connect the other brass fitting to a portable gas analyzer for monitoring of tracer concentration inside the chamber at the point of injection.

There are four sampling ports on the chamber to allow gas extraction at a screened interval while monitoring and/or introducing tracers in three other screened intervals if desired. Two sample ports consist of stainless-steel Swagelok® quick connect bodies on the exterior and interior of the chamber. One sample port consists of a Swagelok® stainless-steel tee with a stainless-steel Swagelok® quick connect body on the interior of the chamber and two stainlesssteel Swagelok® quick connect bodies on the exterior of the chamber. The centrally located port is equipped with a stainless-steel Swagelok® cross with a stainless-steel Swagelok® quick connect body on the interior of the chamber, two stainless-steel Swagelok® quick connect bodies on the exterior of the chamber, and a stainless-steel Swagelok® toggle valve which is then connected to another stainless-steel Swagelok® quick connect body. The configuration of the centrally located sample port allows for collection of samples in evacuated canisters (not used in this investigation) and placement of an inline 1.0 um polypropylene Whatman disposable filter for gas-water separation. Use of disposable filters eliminates the need to clean the gas-water separator in the event of water entrapment. The toggle valve allows the portion of the sample train upstream from the valve to be shut-in when sampling using evacuated canisters. Stainless-steel Swagelok® single-end shutoff stem (SESO) are used to connect the port used for sampling (two external quick-connects) to the centrally located port. SESO stems remain open when uncoupled.

The toggle valve is connected to Swagelok® 6.35 mm stainless-steel flexible tubing, a stainless-steel Swagelok® barbed fitting, and 6.35 mm (1/4") Tygon Masterflex tubing. The Tygon tubing

is feed into a Masterflex E/S Portable peristaltic pump which allows gas extraction at approximately 1 liter per minute (LPM). The tubing is then attached to Nafion® tubing to reduce the relative humidity of the gas stream and to ensure a condensing atmosphere in portable gas analyzers. If the relative humidity of atmospheric air is low (e.g., less than 50%), a Perm Pure moisture exchanger (exchanges water with atmospheric air) will be used. If relative humidity is high (e.g., greater than 50%), a 48" Durridge® Drystik (allows gas flow through an inner tube while removing water vapor via counter flow through an outer tube) will be used. Ambient air will be passed through a cylinder of Drierite and fed to the Drystik to flush water vapor from the tubing. Nafion® is a copolymer of perfluoro-3,6-dioxa-4-methyl-7octene-sulfonic acid and tetrafluoroethylene (Teflon®). Only three compounds or classes of compounds are normally removed directly by Nafion® tubes: water (H-OH), ammonia (when water is present, NH₃ reacts to form NH₃-OH), and alcohols (R-OH, where R is any organic group). Thus, Nafion® tubing should not affect gas screening or laboratory analysis. Nevertheless, both standards and equipment blanks will be run through the Nafion® tubing to ensure that this is the case.

Tygon Masterflex tubing will be used to connect Nafion® tubing to a 6.35 mm brass barb and the inlet of a 150 mm Gilmont Accucal flowmeter. Flow is measured in standard cubic centimeters per minute (sccm). The outlet of the flowmeter is connected to a stainless-steel Swagelok® cross equipped with two stainless-steel Swagelok® quick-connect bodies to allow duplicate collection of soil-gas samples in Cali-5 Bond gas sample bags for submittal to Isotech Laboratories. The cross is connected to a stainless-steel Swagelok® toggle valve to allow gas flow through the flowmeter to be shut-in while bypass gas flow from the leak chamber flows through another in line stainless-steel Swagelok® toggle valve in route to portable gas analyzers. This toggle valve allows the use of one gas analyzer to measure gas tracer concentration in the sample train and chamber during leak testing.

A 6.35 mm brass barb on the flowmeter is used to connect the sample train to a GEM2000 Plus CES LandTec Gas Analyzer for continuous measurement of O₂, CO₂, CH₄, CO, H₂, and H₂S in the gas stream for purge testing and screening of soil-gas samples. The outlet of GEM2000 Plus LandTec Gas Analyzer is then fed into a Thermo Scientific TVA-1000B flame ionization detector (FID)/photoionization detector (PID) for continuous measurement of hydrocarbons.

Gas extraction occurs by connecting the quick-connect body on the inside of the chamber associated with the port containing two external quick-connect bodies to the quick-connect body of a soil-gas probe using a stainless-steel Swagelok® double-end shutoff (DESO) stem, Swagelok® 6.35 mm stainless-steel flexible tubing, and a 316 stainless-steel tube-fitting single-end shutoff stem (SESO). A DESO stem has a valve that seals when uncoupled allowing vacuum testing of the entire sample train.

The stainless-steel chamber used for leak testing with dedicated vapor probes will allow approximately 20 cm clearance from the ground surface for soil-gas sampling using the PRT system. Another chamber will be constructed to increase ground clearance to 60 cm. In this case, ports for additional probes in a cluster will not be necessary since there is only one probe per location.

4.2.d Leak Testing

During soil-gas sampling, ambient air may enter a sampling vessel through loose fittings in above ground components of the sampling train or through openings or cracks in and/or around concrete and bentonite seals used to isolate one or more screened intervals at discrete depths.

Components of the above ground sampling train will be tested for leakage prior to soil-gas sampling by observing vacuum loss as a function of time. The Ideal Gas Law will be used to estimate flow of ambient air into above ground components of a sampling train as a function of vacuum. A peristaltic pump will be used to create a vacuum of greater than 90 kPa (atmospheric pressure = 101.325 kPa). Vacuum will be measured using a Sper Scientific manometer. Pressure readings will be stored in a PC using a RS232 cable and software provided by the manufacturer. Pressure will be recorded every second. Previous testing using the sampling train indicates that leakage in above ground components is well below 0.1 sccm. Given that sample flow varies from 300 to 1000 sccm, this contribution to overall leakage is negligible.

Evaluation of leakage in a borehole necessitates the use of non-degradable, non-reactive, and relatively conservative (little retention in soil or water) gases with low ambient and subsurface concentration that can be analyzed in real time in the field using portable gas analyzers. Helium, which has a dimensionless Henry's Law Constant (measured as air concentration/water concentration) of 110 at 20°C, is the most commonly used tracer for leak testing. However, He cannot be used in this investigation since it is a target analyte. Carbon monoxide (CO) is a suitable second choice since it still relatively insoluble in water having a dimensionless Henry's Law constant of 43. For comparison, N2, O2 and CO2 which is slightly soluble in water have dimensionless Henry's Law Constants of 61, 31, and 1.2 respectively. Soil-gas will be analyzed prior to tracer testing to check for background. If CO is detected at elevated background concentrations in soil-gas, 1,1-dichloro-2,2,2-trifluoroethane (R-123), which has a dimensionless Henry's Law Constant of 1.4, will be used for leak testing. Sulfur hexafluoride is the most commonly used halocarbon for leak testing but its use in this investigation was deemed inappropriate since it has an extremely high global warming potential of 10,000. R-123 has a global warming potential of only 90 (CO₂ = 1.0) and an ozone depletion factor of only 0.02 (R-11 = 1.0).

Tracer gas, CO, at 18,000 ppmv, will be injected into the chamber during leak testing. The flow rate will be measured using a variable area flowmeter. Leak testing of CO at a concentration of 18,000 ppmv and detection at 10 ppmv provides leak detection sensitivity at 0.055%. Leak testing at a concentration of 10,100 ppmv and detection at 25 ppmv provides leak detection sensitivity at 0.25%.

4.2.e Purge Testing

Tubing connected to an initially closed valve at the top of a dedicated vapor probe will have had direct contact with ambient air prior to sampling. Thus, some volume of gas must be extracted prior to sampling to eliminate the influence of ambient conditions. A simple mass balance equation can be utilized to demonstrate that when the initial concentration in a probe is zero, the most conservative condition, extraction of 3 to 5 internal volumes ensures that vapor concentrations entering a sampling vessel are 95% to greater than 99%, respectively, of gas concentrations in the surrounding soils. However, the process of borehole creation and subsequent vapor probe installation likely perturbs vapor concentration some distance from a borehole. Thus, if vapor equilibration has not occurred prior to sampling, greater than 3 to 5 internal volume exchanges (including the internal volume of the sandpack) may be necessary to achieve a stable concentration. This has been observed during an ongoing investigation at another site.

Borehole installation methods such as air rotary, would be expected to impact vapor

concentrations a significant distance from a borehole. Air rotary is often used in consolidated media. Rotosonic drilling is frequently used for borehole creation in glacial till where large cobbles are present and in semi-consolidated media and induces intense vibration and heating of soils adjacent to the casing. Direct-push sampling methods such as the Geoprobe PRT system used in this investigation likely results in the least disturbance since sampling is accomplished without removal of soil. However, direct-push techniques compress surrounding soil and may result in air restriction in plastic clayey soils. This has been observed during an ongoing investigation at another site.

A practical approach to evaluating nonequilibrium is to collect sequential samples or samples preceded by various extraction volumes (i.e. purging) until relative stability of vapor concentration is achieved. During soil-gas sampling, mass removed in the vicinity of a probe is replaced by mass drawn in by gas advection from surrounding soil and by partitioning from soil to water and water to air. If vapor nonequilibration exists, vapor concentration will increase with gas extraction volume as less contaminated disturbed soil gas is replaced by more contaminated less disturbed soil gas. Subsequent purging efforts then should result in achievement of steady-state concentrations at less purge volumes. This has been observed during an ongoing investigation at another site.

When evaluating the potential impact of excessive purging, concentration reduction during gas extraction will not occur until significant mass removal occurs at and above a probe as relatively clean atmospheric air replaces contaminated soil gas or when the rate-limited mass exchange occurs from high pore-gas velocities. Thus, attainment of a near constant concentration (± 1% of O₂, CO₂, and CH₄ readings) during purging ensures attainment of equilibrium and the absence of excessive purging. For instance, DiGiulio et al. (2006b) evaluated the effect of extracting a large volume of air from a relatively shallow vapor probe (screened interval 2.1 meters to 2.4 meters below grade). The internal volume of the probe was one liter. The probe had been sealed for at least three months prior to sampling. A total of 103 liters of air were extracted during this test. After the first internal exchange, sample concentration then remained relatively constant.

Readings will be recorded manually onto a spreadsheet illustrated in **Figure 9** and then input into an EXCEL spreadsheet.

4.2.f Gas Permeability Testing

Gas permeability determination is necessary to simulate gas flow in soil during soil-gas sampling. Gas flow modeling is useful in evaluating the volume from which gas is extracted during purging and sampling and the potential for interaction with atmospheric air. This analysis becomes critical when sampling at shallow (e.g., < 1 meter) depths.

There are a number of publications describing field-scale gas permeability tests. These tests however typically involve extraction or injection from a gas well or probe at flow rates exceeding 30 LPM with measurement of pressure in nearby probes. Estimates of radial and vertical permeability represent integrated values over the field of measurement. During soil-gas sampling, gas permeability testing is conducted at much lower flow rates (e.g., < 1 LPM) with measurement of pressure at point of extraction or injection (i.e., single-interval testing). Single-interval testing provides permeability estimation over a relatively small volume of subsurface media thereby providing a mechanism for assessing physical heterogeneity or spatial variability in permeability on a scale much smaller than full field-scale tests.

In highly permeable media such as sand, steady-state conditions are typically achieved in seconds. In silt or media of less permeability, steady-state is typically achieved in tens of minutes. In low permeability media, transient gas permeability testing eliminates the need to wait for attainment of steady state and allows estimation of gas-filled porosity in a formation.

Line-source/sink analytical solutions are commonly used transient gas flow analysis and parameter estimation. The implicit assumption in use of these solutions is that borehole storage effects are insignificant. Varadhan and DiGiulio (unpublished) derived an analytical solution for two-dimensional axisymmetric anisotropic transient gas flow from a well having a finite radius and borehole storage. The analytical solution is described by DiGiulio and Varadhan (2001). DiGiulio and Varadhan (2001) compared the line-source/sink and finite-radius solutions at the radius of the sandpack during air injection. The line-source/sink solution simulated a more rapid rise in normalized (observed pressure/initial pressure) pressure at early time and a lower normalized pressure at late time compared to the finite-radius solution. The former effect is due to a delayed response from borehole storage. The latter effect is due to simulation at some distance in the formation itself for the line-source/sink solution compared to simulation at the sandpack -formation boundary for the finite-radius solution. Thus, neglecting borehole storage can result in a source of error in estimating gas permeability when conducting single-interval tests.

In this investigation, the analytical solution developed by Varadhan and DiGiulio (unpublished) will be used to interpret single-interval transient gas permeability tests. Pressure readings will be recorded every second using a Sper Scientific manometer and stored in a PC using a RS-232 cable and software provided by the manufacturer. Pressure measurement will occur prior to entry into the gas/water separator to avoid measurement of head loss associated with most above ground fittings. Head loss associated with tubing and quick-connects prior to the point of pressure measurement will be determined at flow rates used for testing and subtracted from pressure differential readings used for analysis. A Gilmont 150 mm variable area Accual flowmeter with a range of 0 to 2100 sccm and a needle valve to control flow will be used to measure flow. The accuracy and precision of the flowmeter is 2% and 1% respectively.

4.2.g Cali-5 Bond Sample Bag Study

A defined holding time is not known for the Cali-5 Bond sample bags. Non-published internal data provided by Isotech Laboratories suggests stability in excess of 105 days for many of the target analytes. However, neither hydrogen nor helium were included, which may be more apt to be lost by diffusion. Attempts to locate published data on holding times for these sample bags was unsuccessful. Isotech Laboratories shall be contracted to conduct this study. To ensure data are not compromised or to identify data that may have been affected by holding times, a study will be done to identify holding times for the target analytes in the Cali-5 Bond sample bags. This study will be done prior to sample collection. If it is determined that gas data may be compromised by exceeding the holding time determined in this study, such data shall be identified with appropriate qualifiers.

Soil-gas samples will be collected in 0.5 liter Cali-5-Bond® evacuated gas sample bags equipped with a Leur-Fit Valve[™]. A Leur-taper Quick-Mate[™] connector with a 4 mm barb fitting will be used to connect flexible tubing to the sampling bag. Cali-5-bond[™] gas sampling bags are constructed from inert 5.5 mil thick material made from five layers of film. The layers are comprised of an inner layer of high-density polyethylene, followed by polyamide, an aluminum

foil barrier, a polyvinylidene chloride layer and an outer layer of polyester.

The stability of fixed gases, hydrocarbons, and stable isotopes in 0.5 liter Cali-5 Bond gas sampling bags equipped with a Leur-Fit ValveTM will be evaluated. Gas from two standards (low and high concentration) prepared by Isotech Laboratories with the same suite of gases to be analyzed for will be analyzed at 0, 1, 3, 10, 15, and 30 days after sample collection. Gas samples will be analyzed for Ar, He, H₂, O₂, N₂, CO₂, CH₄, C₂H₆, C₂H₆, C₃H₆, C₃H₆, iC₄H₁₀, nC₄H₁₀, iC₅H₁₂, nC₅H₁₂, C₆+, δ13C and δD of CH₄ and δ13C for CO₂. Measurement at time zero will be necessary if components such as H₂ or He are added to an existing standard. A duplicate sample will be collected at each sample period (once every two samples) alternating between high and low standard concentrations. For instance, at time zero, two samples will be analyzed for the high standard concentration and one sample will be analyzed at the low standard concentration. At time 1 day, two samples will be analyzed for the low standard concentration and one sample will be analyzed for the low standard concentration and one sample will be analyzed at the high standard concentration and so on. This will result in analysis of 18 samples.

The laboratory conducting this work must have demonstrated proficiency in conducting analyses for the determination of concentrations of gas components and stable isotope analyses of carbon in methane and carbon dioxide. This may be demonstrated by accreditation through a recognized authority, such as ISO (International Organization for Standardization), and/or by providing documentation of successful analyses of reference standards. The laboratory shall provide documentation for their QA program (e.g., Quality Management Plan or Quality Assurance Plan).

Fixed gases and hydrocarbons shall be analyzed by gas chromatography and a combination of TCD/FID detectors using a method based upon ASTM D1945-03. Sample reporting units may be mol% or ppmv. Those samples with sufficient concentrations of methane and carbon dioxide (~0.5%) will be analyzed for δ^{13} C of methane and carbon dioxide by isotope ratio mass spectrometry. Method documentation with QC acceptance criteria shall be provided by the laboratory.

Primary standards for δ^{13} C analyses will originate from the International Atomic Energy Agency, Vienna, Austria, and certified by National Institute of Standards and Technology (NIST). Secondary and working standards will be calibrated against the primary standards. Standards for the gas component analysis shall be certified and traceable to NIST.

Accuracy and precision of stable carbon and hydrogen isotope analyses will be within 0.5 per mil or less $\delta 13C$ and δD , i.e, the measured value of check or reference standards compared to their known or certified value, and the difference between duplicate sample analysis shall meet this criteria. As previously indicated, every second analysis shall be a sample duplicate. Check or reference standards shall be analyzed every tenth analysis, ensuring that sample runs are always bracketed by standards. Blanks shall be analyzed prior to samples to determine presence of background. Presence of background that would interfere with sample analysis shall be corrected prior to sample analysis.

Accuracy of gas component analysis will be within +/-15%, i.e., the measured value of standards compared to their known or certified value. Precision of the analyses shall be determined by duplicate sample analysis with a Relative Percent Difference (RPD)* not to exceed 15%. As previously indicated, every second analysis shall be a sample duplicate. Check or reference standards shall be analyzed every tenth analysis, ensuring that sample runs

are always bracketed by standards. Blanks shall be analyzed prior to samples to determine presence of background. Presence of background that would interfere with sample analysis shall be corrected prior to sample analysis.

Full data packages shall be provided on CD for all sample analyses to allow for reconstruction of analysis: Chain-of-custody forms, calibration documentation, QA/QC results, raw data, data reduction, data qualifiers, quantitation and detection limits, deviations from method requirements, deviations from QC acceptance criteria, and these deviations' impact to reported results.

Where a = sample measurement
b = duplicate sample measurement (a>b)

4.2 h Soil-Gas Sample Labeling

Labeling tape will be affixed to each Cali-5 Bond sample bag. Water insoluble ink will be used to record sample identification, date and time of collection, and initials of person collecting the sample on each label.

4.2i Soil-Gas Sample Packing and Shipping

Isotech Laboratories will provide UN approved one gallon metal cans for shipment of Cali-5 Bond sample bags. Up to three 0.5 liter 6" x 8" bags can fit into each can when properly filled. Care will be taken to not compress the sample bags while packing. After packing, the lid will be placed on top of the can sealed by pounding on a plastic ring provided with the can. Metal cans will be placed in fiberboard boxes provided by Isotech Laboratories according to the general instructions included with the box. Samples will be shipped overnight through UPS. If soil-gas samples contain less than 5% methane (or other hydrocarbons), they are not considered flammable nor hazardous for shipping purposes. The Chain of Custody form that will accompany soil-gas samples is illustrated in **Figure 10**.

If samples contain greater than 5% methane, they are considered flammable and require additional labeling and handling. UPS will only accept "Dangerous Goods" from the U.S. Department of Transportation (DOT) certified shippers who have contract with UPS. NRMRL-Ada meets both of these requirements. Isotech Laboratories provides instructions on labeling and shipping boxes containing flammable soil-gas samples which are based on the IATA Dangerous Goods Regulations 48th Edition, 2007". The following labels will be affixed to the outside of the box all on the same side: (1) FLAMMABLE GAS, (2) UN3167, and (3) DANGER DO NOT LOAD IN PASSENGER AIRCRAFT. Labels will not be folded or affixed in such a manner that parts of the same label appear on different faces of the package. A "SHIPPERS DECLARATION FOR DANGEROUS GOODS" obtained from UPS will accompany soil-gas samples. The information that may be needed on this form is given below.

Proper Shipping Name: Gas Samples, non-pressurized, flammable, n.o.s. (Natural Gas)

Class or Division: 2.1

UN or ID Number: UN3167

Subsidiary Risk: None (leave blank)

Packaging Group: None (leave blank)

Quantity& Type of Packaging: # Fiberboard boxes box X 4L Packing Instructions: 206

Shipment Type: Non-Radioactive

Prepared per: ICAO/IATA
Additional Information:

NRMRL-Ada emergency response telephone number

Limitations: Cargo Aircraft Only

As required by the Department of Transportation (49 CFR - Part 172, Subpart G, §172.604) a person who offers a hazardous material for transportation must provide an emergency response telephone number, including the area code or international access code, for use in the event of an emergency involving the hazardous material. A Materials Safety Data Sheet (MSDS), illustrated **Figure 11**, will accompany soil-gas samples exceeding 5% methane.

5.0 MEASUREMENT PROCEDURES

5.1 Ground Water

Ground-water samples will be collected and analyzed using standard operating procedures. Analysis includes inductively coupled plasma - optical emission spectroscopy (ICP-OES; for cations), inductively coupled plasma - mass spectroscopy (ICP-MS; for trace metals), liquid chromatography - inductively coupled plasma - mass spectroscopy (LC-ICP-MS; for arsenic speciation), capillary electrophoresis (CE, anions), carbon analysis using infrared detection, isotope ratio mass spectroscopy for isotope ratios in water, and gas chromatography (GC, for dissolved gas analysis). These analytical methods and accompanying QA/QC practices (e.g., blanks, calibration checks, duplicates, second source standards, matrix spikes) are described in various in-house Standard Operating Procedures RSKSOP-102v5, RSKSOP-213v4, RSKSOP-175v4, RSKSOP-194v4, RSKSOP-214v5, RSKSOP-257v2, RSKSOP-276v3, RSKSOP-296v0, and RSKSOP-297v1 or RSKSOP-298v1). Matrix spikes sample spiking levels are determined at the discretion of the individual analysts (based on sample concentrations) and are included with the sample results. An updated version RSKSOP-174v4 will need to be developed by Shaw as part of this study for samples collected from deep wells with the sample bombs. The updated SOP will address analysis procedures for pressurized samples and procedures for carrying out calculations.

Samples will be submitted to Isotech Laboratories for analysis of stable isotope ratios (δ 13C) of dissolved inorganic carbon by gas-stripping and IRMS. A general discussion of QA/QC for Isotech Laboratories is provided in their QAP attached in **Appendix A**. However, acceptance criteria are not included. An inquiry will be made of Isotech for this information.

Samples will be submitted to the Region 8 analytical laboratory for analysis of organic compounds. The resulting data will not be included in this project. Region VIII is responsible for QA/QC for these samples.

5.2 Soil-Gas

5.2.a Field Screening During Soil-Gas Survey

A summary of instruments to be used in this investigation, method of measurement (standard operating procedures), concentration range of measurement, concentrations for calibration, and concentrations of gas standards to be used to check the accuracy of instruments is summarized in **Table 4**. The methods to be used are listed in **Table 5**. The accuracy of the instruments will be checked using criteria listed in **Table 5** from the SOPS cited in this table. Gas standards for calibration will be introduced into five-liter SKC Flex Foil sampling bags and feed directly to portable gas analyzers. Check standards will be introduced into ten-liter SKC Flex Foil sampling bags and feed into the sampling train to ensure the absence of flow and material (e.g., tubing, filters, etc) effects.

The Thermo Scientific TVA-1000B will be calibrated at all concentrations listed. Other portable gas analyzers will be calibrated at the concentration specified or at a concentration closest to expected soil-gas concentration. Calibration will occur at the beginning of each work day and when deviation from a check standard at the calibration concentration(s) at the relevant accuracy occurs. The concentration selected for calibration will be that closest to the expected soil-gas concentration. A check standard at the calibration concentration and a method blank will be measured prior to and at the end each sample event and at all concentrations during calibration. "Accuracy" in **Table 4** is per the manufacturer's specifications and may not reflect project requirements.

Carbon monoxide (tracer) will be supplied using gas cylinders (103 liter) obtained from Air Liquide in Plumsteadville, PA using certified gas mixture concentrations with balance air. R-123 (alternative tracer) will be supplied using gas cylinders (221 liter) obtained from Air Liquide America Specialty Gases, LLC from Plumsteadville, PA using certified gas mixtures with balance argon. Two gas standards (103 liter cylinders): (1) 2.5% CH₄, 5% CO₂, 10% O₂, balance N₂ and (2) 2.5% CH₄, 20% CO₂, 10% O₂, balance N₂ will be obtained from Ideal Gas Inc. in Southgate, MI and two gas standards (103 liter cylinders): (1) 50% CH₄, 35% CO₂, balance N₂ and (2) 4% O₂, balance N₂ obtained from James Supply and Rental in Ada, Oklahoma will be used for calibration and concentration checks for O₂, CO₂, and CH₄. Gas standards for H₂S and H₂ will be obtained from CES-LANDTEC from Colton, CA.

Carbon dioxide and CH₄ are measured in the GEM2000 Plus using IRGAs. The CO₂ reading is filtered to an infrared absorption frequency of 4.29µm (nominal), the frequency specific to CO₂. Therefore, other gases typically detected in soil gas will not affect the CO₂ reading. The CH₄ reading is filtered to an infrared absorption frequency of 3.41µm (nominal), the frequency specific to hydrocarbon bonds. The presence of other light hydrocarbons (e.g. ethane, propane, butane) will result in a higher reading of CH₄ than actually present. Oxygen, H₂S, and CO are measured in the GEM2000 Plus using internal electrochemical cells. The O₂ sensor is a galvanic cell type with no influence from CO₂, CO, H₂S, SO₂ or H₂. The electrochemical cell for CO is susceptible to interference from H₂ and H₂S giving an artificially high reading of CO in the presence of these gases. The GEM2000 Plus uses a 'hydrogen compensated' CO cell to counteract the interference of H₂ and an internal H₂S filter to eliminate H₂S cross gas interference.

A Thermo Scientific TVA-1000B will be used to screen for total hydrocarbons using a portable flame ionization detector (FID) and photo ionization detector (PID) according to RSKSOP-320v0 - Determination of Organic and Inorganic Vapors using the TVA-1000B Toxic Vapor Analyzer.

5.2.b Fixed-Laboratory Analysis of Soil Gas

Fixed-laboratory analysis of soil-gas samples will be performed by Isotech Laboratories. Approximately 20 soil-gas samples including duplicates, travel, and equipment blanks will be collected from dedicated soil-gas probes in September 2010. All samples and duplicates will be analyzed for Ar, He, H₂, O₂, N₂, CO₂, CH₄, C₂H₆, C₂H₄, C₃H₆, C₃H₈, iC₄H₁₀, nC₄H₁₀, iC₅H₁₂, nC₅H₁₂, C₆+, δ 13C and δ D of CH₄ and δ 13C for CO₂. Equipment and travel blanks will be analyzed for fixed gases and hydrocarbons only. Approximately 15 soil-gas samples will be collected from dedicated vapor probes in September 2010 and analyzed for the components outlined above in addition to Δ 14C for CH₄. A Chain of Custody form, illustrated in **Figure 10** will accompany each sample. With the exception of Δ 14C, turnaround time should be less than 10 days or less from date of sampling.

Fixed gases and hydrocarbons will be analyzed by gas chromatography and a combination of TCD/FID detectors using method based on ASTM D1945-03. Sample reporting units may be mol% or ppmv. Those samples with sufficient concentrations of methane and carbon dioxide (~0.5%) will be analyzed for δ^{13} C of methane and carbon dioxide by isotope ratio mass spectrometry. Samples for determination of $\Delta 14$ C in methane will be analyzed by accelerator mass spectrometry.

6.0 Quality Metrics (QA/QC Checks)

6.1 Quality Metrics (QA/QC Checks) for Field Screening Gas Analysis

QA/QC requirements for field screening of gas samples are provided in Table 5.

6.2 Quality Metrics for Fixed Laboratory Gas Analysis

QA/QC requirements for fixed laboratory analysis of gas samples are provided in **Table 6**.

A summary of field-based QC samples, purpose, method, and frequency for soil-gas sampling is provided in **Table 7**. This is exclusive of QC samples required at Isotech Laboratories.

The laboratory conducting gas analysis must have demonstrated proficiency in conducting analyses for the determination of concentrations of gas components and stable isotope analyses of carbon in methane and carbon dioxide. This may be demonstrated by accreditation through a recognized authority, such as ISO (International Organization for Standardization), and/or by providing documentation of successful analyses of reference standards. The laboratory shall provide documentation for their QA program (e.g., Quality Management Plan or Quality Assurance Plan).

The laboratory will be subject to a QA audit in conjunction with sample analysis or prior to their receipt. Arrangements will be made with the laboratory in advance. Method documentation with QC acceptance criteria shall be provided by the laboratory.

Primary standards for δ 13C and δ D analyses shall originate from the International Atomic Energy Agency, Vienna, Austria, and certified by National Institute of Standards and Technology (NIST). Secondary and working standards shall be calibrated against the primary standards. Standards for the gas component analysis shall be certified and traceable to NIST. Standards for Δ 14C analysis will be certified and traceable to NIST. Instruments will be calibrated or confirmed to be calibrated prior to sample analysis. Calibration will be linear within the range of use. Initial calibration will be verified by using a second source standard (standard from source

different than those used for initial calibration.

Accuracy and precision of stable carbon and hydrogen isotope analyses will be within 0.5 per mil or less $\delta 13C$ and δD , i.e, the measured value of check or reference standards compared to their known or certified value, and the difference between duplicate sample analysis shall meet this criteria. At least every tenth analysis will be a sample duplicate*. Check or reference standards will be analyzed every tenth analysis, ensuring that sample runs are always bracketed by standards. Blanks shall be analyzed prior to samples to determine presence of background. Presence of background that would interfere with sample analysis shall be corrected prior to sample analysis.

Accuracy and precision of 14C analysis will be within 1pMC (percent modern carbon). Analysis should be capable of detection to 2.0 pMC with a precision of ± 5‰. Standards of known and documented uncertainty will be analyzed at a frequency according to the laboratory's QA requirements and acceptance limits, such that sample runs are bracketed by standards. Blanks will be analyzed prior to samples to determine presence of background. Presence of background that would interfere with sample analysis will be corrected prior to sample analysis.

Accuracy of gas component analysis shall be within +/-15%, i.e., the measured value of standards compared to their known or certified value. Precision of the analyses shall be determined by duplicate sample analysis with a Relative Percent Difference (RPD) defined as

$$RPD = \frac{2(a-b)}{a+b}100$$

where a = sample measurement and b = duplicate sample measurement. RPD should not to exceed 15%. At least every tenth analysis shall be a sample duplicate. Check or reference standards shall be analyzed every tenth analysis. Blanks shall be analyzed prior to samples to determine presence of background. Presence of background that would interfere with sample analysis shall be corrected prior to sample analysis.

If any of the laboratory's standard QA/QC criteria are stricter than those delineated here, then it is expected that the laboratory will default to their criteria for these sample analyses.

Full data packages shall be provided on CD for all sample analyses to allow for reconstruction of analysis: Chain-of-custody forms, calibration documentation, QA/QC results, raw data, data reduction, data qualifiers, quantitation and detection limits, deviations from method requirements, deviations from QC acceptance criteria, and these deviations' impact to reported results.

Isotech Laboratories will submit a final report at completion of analysis which includes: (1) statements outlining analytical procedures, (2) pretreatments applied, and (3) calendar calibration information.

Sample bags will be purged with laboratory-grade N₂ at least three times prior to sample collection. Sample container blanks (at least one per every 10 samples) will be collected for both field screening (if sample bags are used) and fixed-laboratory analysis (see **Table 7**) to ensure the absence of cross-contamination.

Detection limits from Isotech Laboratories will be acquired to determine if they meet project objectives.

* Sample duplicates will be performed on our samples submitted for this work, i.e., sample duplicate results for samples from other sources (for analytical runs that may include samples from other sources) will not be considered for meeting these QC requirements.

6.3 Quality Metrics (QA/QC Checks) for Aqueous Analysis

QA/QC requirements (e.g., blanks, calibration checks, duplicates, second source standards, matrix spikes) are described in various in-house Standard Operating Procedures and summarized in **Table 3**. Matrix spikes sample spiking levels are determined at the discretion of the individual analysts (based on sample concentrations) and are included with the sample results.

Samples will be submitted to Isotech Laboratories for analysis of stable isotope ratios (δ^{13} C) of dissolved inorganic carbon and δ^{13} C of dissolved gases, C1-C5, as well as δ^2 H of methane. A general discussion of their QA/QC is provided in their QAP attached in Appendix A. Isotech has provided input on their acceptance criteria (see Table 3). In addition, a Statement of Work was provided to Isotech with relevant information presented here:

Samples will be provided from two separate ground-water monitoring wells. One well will be sampled in duplicate. A total of three samples will be submitted in total. In addition to the field duplicate, it is expected that the vendor will select one sample for a laboratory duplicate analysis to fulfill QA/QC requirements. This sample needs to be from this sample set and not from another site or sample queue. For this reason, we have added the cost of an additional analysis to cover the laboratory duplicate. The samples will be provided in 1 L bottles provided by Isotech Laboratories. The bottles will be filled with about 400 mL of ground water. It is expected that the concentration of DIC and dissolved gases will be high enough in the samples so that this volume will be adequate for the analyses. The sample bottles will already contain the preservative (2% benzalkoniumchloride). Samples for DIC will collected filtered into 60 mL plastic bottles. The bottles will be transported so that the aqueous solution will be on top of the bottle closure, i.e., the bottles will be transported upside down. Analyses of the laboratory duplicates will agree within 1 permil δ^{13} C and within 2 permil δ^{2} H, or less. The measured value of the stable carbon and hydrogen isotope ratio in calibration standards will be within 0.5 permil or less of the nominal value in the calibration standards. Isotech Laboratories will submit a final report at completion of analysis which includes: (1) statements outlining analytical procedures. (2) pretreatments applied, and (3) calibration information. Full data packages shall be provided on CD for all sample analyses to allow for reconstruction of analysis: Chain-of-custody forms, calibration documentation, QA/QC results, raw data, data reduction, data qualifiers, quantitation and detection limits, deviations from method requirements, deviations from QC acceptance criteria, and these deviations' impact to reported results. Results of the analysis will be reported to Rick Wilkin via e-mail at wilkin rick@epa.gov within four weeks of the receipt of the samples.

*Isotech cannot meet criterion of 0.5 per mil for H. Their criterion is 2 per mil.

6.3.a Measured and Calculated Solute Concentration Data Evaluation

The computer program AqQA (RockWare Inc., version 1.1.1) will be used as a check on the quality of solute concentration data. Two methods will be used. First, the specific conductance

values measured in the field will be compared to a calculated value that is based on anion- and cation-specific resistivity constants and the measured concentrations of anions and cations in specific ground-water samples. The agreement between the measured and calculated values should be within 15%. The second method will be to calculate the charge balance for each solution. This is done by summing and comparing the net positive and negative charge from the measured concentrations of anions and cations. The agreement should be within 10%. Poor agreement would suggest that some major solute(s) is not accounted for in the analytical measurements. At the discretion of the PI, discrepancies in this manner will be either flagged or the identity of other sample components and/or reason(s) for poor agreement will be investigated.

6.3.b <u>Detection Limits</u>

Detection limits for the various analytes are listed in the Standard Operating Procedures for these methods and are not repeated here. They are adequate for project objectives.

6.3.c QA/QC Calculations

% Recovery or Accuracy

%REC = (m/n) x 100 Where m = measurement result n = True Value (a certified or known value) of standard or reference

Precision

Precision is described by Relative Percent Difference (RPD) as previously defined. The Relative Percent Difference (RPD) is calculated based on the following:

$$RPD = \frac{2(a-b)}{a+b}100$$

where a = sample measurement and b = duplicate sample measurement and a > b.

Matrix Spike Recovery

Matrix spikes sample spiking levels are determined at the discretion of the individual analysts (based on sample concentrations) and are included with the sample results.

%
$$Re cov ery = \frac{spiked \ sample \ conc - native \ sample \ conc}{spiked \ sample \ conc} 100$$

7. Data Analysis, Interpretation, and Management

Data validation will consist of initial and final review of data. Initial review will include continuous oversight during field collection of data by the principal investigator to avoid common transcription errors associated with recording of data. Final review will include evaluation of all collected data for suitability in data interpretation. It will include but is not limited to the following activities: (1) assessment of data completeness, (2) review of log books and forms used for

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data logging, and (3) review of calibration and standard checks.

7.1 Data Recording

7.1.a Soil Gas

To ensure collection of all relevant data during each purging event, a spreadsheet, illustrated in **Figure 8**, will be used to manually record readings from the GEM2000 CES LandTec Gas Analyzer. The data will be collected by a technician during testing and reviewed in the field by the principal investigator during and at the cessation of each test. The principal investigator will then convert purging data to an EXCEL spreadsheet for electronic storage and data manipulation. For gas permeability testing, pressure readings will be recorded every second and stored in a file in a PC using a RS232 cable.

7.1.b Water

Data collected during the ground-water investigation will be recorded into field notebooks and entered into EXCEL spreadsheets. Water quality data will also be entered into AqQA a program for evaluating ground water quality and for evaluating data validity. Graphs will be produced using EXCEL or Origin to show key data trends.

7.2 Data Storage

As this is a Category I project, all data and records associated with this project will be kept permanently and will not be destroyed. All data generated in this investigation will be stored electronically in Microsoft EXCEL and backed up in RSKERC's local area network 'M' drive. All paper-based records will be kept in the PI's offices. If the project records are archived, Dr. DiGiulio will coordinate with Dr. Wilkin the compiling of all data and records.

7.3 Analysis of Data

All data collected associated with ground-water and soil-gas sampling will be summarized in EXCEL spreadsheets. Data in spreadsheets will be spot-checked against original data reports by selecting random data points for comparison to verify accuracy of data transfer. When possible, data sets will be graphically displayed using EXCEL, Sigma Plot, and Origin to reveal important trends.

8.0 Assessment and Oversight

8.1 Assessments

Technical Systems Audits (TSAs) and Audits of Data Quality (ADQs) will be conducted early in the project to allow for identification and correction of any issues that may affect data quality. TSAs will be conducted on both field and laboratory activities. Detailed checklists, based on the procedures and requirements specified in this QAPP and related SOPs, will be prepared and used during these TSAs. Two field TSAs will be done; one on the soil gas sampling and the other on the ground water sampling. It is anticipated these will take place in late September to October, 2010. The GWERD QA Manager (QAM), Steve Vandegrift, will take the lead on these audits with contract support from Neptune and Co.

Laboratory TSAs will focus on the critical target analytes and will be conducted on-site at GWERD (involves both EPA and contractor-operator labs) and at an off-site contract laboratory which will do the gas and isotope analysis. It is anticipated these will take place in late September to October, 2010. At this time, Isotech Laboratories, Inc., in Champaign, IL, is anticipated to be the off-site contract lab. The GWERD QA Manager will take the lead on the TSA with contract support from Neptune and Co. for the off-site contract lab. The on-site lab TSA will be conducted by the GWERD QAM, with assistance from the NRMRL Director of QA, Lauren Drees in the preparation of checklists.

ADQs will be conducted on a representative sample of data for the critical target analytes. These will be performed by the GWERD QAM with assistance from the NRMRL Director of QA. These will begin with the first data sets (October, 2010) to ensure there are no issues with the data and to allow for appropriate corrective actions on subsequent data sets if needed.

8.2 Assessment Results

Assessment results will be documented in reports to the PIs and the GWERD Division Director. If any serious problems are identified that require immediate action, the QAM will verbally convey these problems at the time of the audit to the PI.

The PIs are responsible for responding to the reports as well as implementing corrective actions, if needed, in a timely manner to ensure that quality impacts to project results are minimal.

8.3 Informing Management

Meetings will be held at least once per month between NRMRL-Ada staff and EPA Region VIII management to keep Region VIII management informed of technical activities.

9.0 Reporting

The principal investigator and co-principal investigator will summarize and interpret data collected for EPA Region VIII to allow incorporation into a comprehensive report being developed by EPA Region VIII. The final product(s) for NRMRL-Ada could be one or more journal articles describing activities and findings at the site. However, these publications would have to be cleared through EPA Region VIII.

10.0 References

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Standard Operating Procedures

RSKSOP-102v5 - Determination of Total Carbon, Total Organic Carbon, Dissolved Carbon, and Dissolved Organic Carbon in Water using the Dohrmann DC-80 Carbon Analyzer 17 p.

RSKSOP-175v4 - Sample Preparation and Calculations for Dissolved Gas Analysis in Water Samples Using a GC Headspace Equilibration Technique, 16p.

RSKSOP-194v4 - Gas Analysis by Micro Gas Chromatographs (Agilent Micro 3000), 13p.

RSKSOP-213v4 - Standard operating procedure for operation of Perkin Elmer Optima 3300 DV

ICP=OES, 21 p. c. line for a said of ground a said Self CO Co Cold

RSKSOP-214v5, Quality control procedures for general parameters analysis using Lacjhat Flow Injection analysis (FIA), 10p.

RSKSOP-257v2, Standard operating procedure for elemental analysis by ICP-MS, 16 p.

RSKSOP-276v3 - Determination of major anions in aqueous samples using capillary ion electrophoresis with indirect UV detection and Empower 2 software, 11 p.

RSKSOP-296v0 - Determination of hydrogen and oxygen isotope ratios in water samples using high temperature conversion elemental analyzer (TC/EA), a continuous flow unit, and an isotope ratio mass spectrometer (IRMS), 8p.

RSKSOP-297v1 - Metals Speciation Determination by LC/ICP-MS, 21 p.

RSKSOP-298v1 - Arsenic Speciation Determination by LC/ICP-MS with Anion Suppression and NaOH Mobile Phase, 21 p.

RSKSOP-313v1 - Determination of R-123 using the H25-IR Infrared Refrigerant Gas Leak Detector, 12p.

RSKSOP-314v1 - Determination of Fixed Gases using the GEM2000 and GEM2000 Plus Gas Analyzers & Extraction Monitors, 13p.

RSKSOP-315v1 – Determination of Carbon Monoxide Using the Bacharach PCA2 Portable Combustion Analyzer, 13p.

RSKSOP-320v0 - Determination of Organic and Inorganic Vapors Using the TVA-1000B Toxic Vapor Analyzer, 18p.

Table 1. Tentative schedule of field activities at Pavillion, WY

Activity	04/10	05/10	06/10	07/10	08/10	9/10	10/10
Site Reconnaissance	Χ						
Monitoring Well installation	180 AL 180 87		Χ	Χ	Χ		- N - 1 - 1
Ground-Water Sampling				Х			Х
Cali-5 Bond Sample Bag Study			Х		a na jaga s	a rijar	
Soil-Gas Survey/ Installation of Probes				Х		i .	
Soil-Gas Sampling (probes)		-				X	

Table 2. Ground Water Sample Collection

Measurement	Analysis Method	Sample Container	Preservation/ Storage	Holding Time(s)	
Dissolved gases	RSKSOP-194v4 &-175v4*/**	150 mL stainless steel (SS) sampling vessel for deep wells & 60 mL serum bottles for tap water samples	Spare tap water samples preserved with/TSP† to compare w/unpreserved; Refrigerate at 4°C	<14 days**	
Metals	RSKSOP-213v4 &-257v2 125 mL Plastic bottle HNO ₃ pH<2		6 months (Hg 28 days)		
As speciation	RSKSOP-298v1 or RSKSOP- 297v1***	30 mL amber plastic	HCl pH<2; refrigerate at 4°C	8 days	
SO₄, CI, F	RSKSOP-276v3	30 mL clear plastic	Refrigerate at 4°C	28 days	
NO ₃ + NO ₂ , NH ₄	RSKSOP-214v5	30 mL clear plastic	H₂SO₄ pH<2; refrigerate at 4°C	28 days	
Dissolved DIC/DOC	RSKSOP-102v5	45 mL glass VOA vial	No headspace; refrigerate at 4°C	28 days	
δ ¹³ C of dissolved inorganic carbon	Isotech: gas stripping & IRMS	60 mL plastic bottle	Refrigerate at 4°C	No information	
δ ¹³ C of dissolved gases and δ ² H of methane	Isotech: gas stripping & IRMS	1 L plastic bottle	Caplet of benzalkonium chloride; refrigerate at 4°C	No information	
O, H stable isotopes of water	RSKSOP-296v0	20 mL glass VOA vial	Refrigerate at 4°C	Stable	
Organics (Region 8)	NA	1L amber glass bottles and 20 mL amber glass vials	Refrigerate at 4°C	NA	

^{*}RSKSOP-175v4 appropriate for samples in serum bottles, not the SS sample vessels

^{**14} days w/acid or trisodium phosphate preservation; holding time not established w/o preservation; comparison will be made between preserved and unpreserved tap water samples.

† trisodium phosphate

^{***} Method RSKSOP-297v1 will be used as the default method. However, if dissolved sulfide is present at levels >0.1 mg/L, then RSKSOP-298v1 will be used. In this case, samples will not be acidified.

Table 3. Groundwater Laboratory QA/QC Requirements Summary* from SOPs

	Method	(Frequency)	Checks	Source	I I I have proported the proportion of the little	(Frequency)
			(Frequency)	(Frequency)	(Frequency)	
		<mdl< td=""><td>85-115% of known value</td><td>85-115% of known value</td><td>RPD<u><</u>20</td><td>NA</td></mdl<>	85-115% of known value	85-115% of known value	RPD <u><</u> 20	NA
	1 1 1 1 1 1 1 1		di Haran Kulung Paner Haran Kulung Baran Kal		(Every 15	
			(After helium	(After first	samples)	
Discolved	RSKSOP-	(He blank, first	blank at first of	calibration		
gases	194v4 &-	and last in	analysis queue,	check)		
9	175v4*	sample queue;	before helium	1		
	- 50.50	water blank	blank at end of		en gar en	the second of th
		before samples)	sample set, and			
:			every 15 samples)			
		<ql 80%="" for="" of<="" td=""><td>90-110% of</td><td>PE sample</td><td>RPD<20 for</td><td>90-110%</td></ql>	90-110% of	PE sample	RPD<20 for	90-110%
	6 G. A. A.	metals	known value	acceptance	80% of	Rec. for 80%
	J. 3	(Beginning and	(Beginning and	limits or 90-	metals	of metals w/
	RSKSOP-	end of each	end of each	110% of		no individual
Metals	213v4	sample queue)	sample queue,	known value	(Every 15	exceeding
Wictors			10-15 samples)	(Immediately	samples)	50-150%
				after		Rec.
				calibration		(at least one
	er (je		reason of the state of	check)		per matrix
						type)
***		<ql 80%="" for="" of<="" td=""><td>90-110% of</td><td>PE sample</td><td>RPD<20 for</td><td>90-110%</td></ql>	90-110% of	PE sample	RPD<20 for	90-110%
		metals; none	known value	acceptance	80% of	Rec. for 80%
		>10x MDL	(Beginning and	limits or 90-	metals	of metals w/
	RSKSOP-	(Beginning and	end of each	110% of		no individual
Metals	257v2	end of each	sample queue,	known value	(Every 15	exceeding
	-0.0-	sample queue)	10-15 samples)	(Immediately	samples)	70-130%
	18 05 888			after first		Rec.
	2.79			calibration		(at least one
				check)	i sa Ngwah	per matrix
			00 1000/ 7	00 4000/ -1	000 -00	type)
		<%QL	80-120% of	80-120% of	RPD<20	80-120%
-1	RSKSOP-	(after initial calib.,	known value	known value	VE	Rec.
	298v1 and	every 10-15	(after initial calib.,	(Immediately	(Every 15	(one per 20
	RSKSOP-	samples, and at	every 10-15	after calibration)	samples)	or every set)
	297v1	end)	samples, and at end)	calibration)	and the same of the same of	
		<mdl< td=""><td>90-110% Rec.</td><td>PE sample</td><td>RPD<10</td><td>80-120%</td></mdl<>	90-110% Rec.	PE sample	RPD<10	80-120%
		(Beginning and	(Beginning, end,	acceptance	(every 15	Rec.
SO ₄ , Cl, F	RSKSOP-	end of each	and every 10	limits	samples)	(one per
304, OI, F	276v3	sample queue)	samples)	(One per	Sumples)	every 20
		sample queue)	Junipies)	sample set)	Samuel Stranger	samples)

the state of the state		<½ lowest calib.	90-110% Rec.	PE sample	RPD<10	80-120%
NO ₃ + NO ₂ , NH ₄	RSKSOP- 214v5	std. (Beginning and end of each sample queue)	(Beginning, end, and every 10 samples)	acceptance limits (One per sample set)	(every 10 samples)	Rec. (one per every 20 samples)
Dissolved DIC/DOC	RSKSOP- 102v5	<1/2QL (after initial calib., every 10-15 samples, and at end)	80-120% of known value (after initial calib., every 10-15 samples, and at end)	80-120% of known value (Immediately after calibration)	RPD<10 (every 15 samples)	80-120% Rec. (one per 20 or every set
O, H stable isotopes of water	RSKSOP- 296v0	NA.	Difference of calibrated/true < 1% for δ H & 18 < 0.2% for δ O (Beginning, end and every tenth sample)	Working stds calibrated against IAEA stds. (Beginning, end, and every tenth sample)	Standard deviation ≤ 1‰ for δ H and < 0.2‰ for δ O (every sample)	NA
δ ¹³ C of dissolved inorganic carbon	Isotech: gas stripping & IRMS	NA .	Referenced to δ^{13} C of the Peedee belemnite (NIST material); Difference of calibrated/true 13 < 0.5% for δ C (Beginning and every tenth)	Working stds calibrated against IAEA std "LSVEC". (Beginning and every tenth)	Difference of < 1 ‰ δ ¹³ C (every tenth sample)	NA
δ ¹³ C of dissolved gases and δ ² H of methane	Isotech: gas stripping & IRMS	NA SASSASSASSASSASSASSASSASSASSASSASSASSA	Referenced to δ ¹³ C of the Peedee belemnite (NIST material); Difference of calibrated/true <0.5 1‰ for δ ¹³ C and < 2‰ for δ ² H**** (Beginning and every tenth)	Working stds calibrated against IAEA std "LSVEC" for C and "SMOW" and "SLAP" for H. (Beginning and every tenth)	Difference of < 1 ‰ δ^{13} C and < 2 ‰ δ^{2} H RPD<10 (every tenth sample)	NA ·

^{*}This table only provides a summary; SOPs should be consulted for greater detail. Corrective actions are outlined in the SOPs.

MDL = Method Detection Limit

QL = Quantitation Limit

PE = Performance Evaluation

^{**}RSKSOP-174v4 will need to be modified to accommodate samples collected from deep wells in the sample bombs

^{***}Although our SOW specified ≤ 0.5 % for δ^2 H, Isotech indicated that their lab criterion is as listed in the table.

Table 4. Summary of analytes, instruments, use, calibration, and check standards for portable gas analyzers

Analyte	Instrument (Detector)	Method	Range	Calibration	Check Standard	Accuracy
O ₂	GEM-2000 Plus CES- LANDTEC (EC Cell)	RSKSOP- 314v1	0 - 21%	4%, 10%	10%, 20.9%	±1.0% (0-5%) ±1.0% (5-21%)
CH₄	GEM-2000 Plus CES- LANDTEC (IRGA)	RSKSOP- 314v1	0 - 100%	2.5%, 50%	2.5%, 50%	±0.3% (0-5%) ±1% (5-15%) ±3% (15-100%)
CO ₂	GEM-2000 Plus CES- LANDTEC (IRGA)	RSKSOP- 314v1	0 - 100%	5%, 20%, 35%	5%, 20%, 35%	±0.3% (0-5%) ±1.0% (5-15%) ±3.0% (15-50%)
CO (tracer)	Bacharach PCA2 Portable Combustion Analyzer (IRGA)	RSKSOP- 315v1	0 – 20,000 ppmv	4,000 ppmv	4,000, 18,000 ppmv	±5% or ± 10 ppmv whichever is greater (0-2000 ppmv) ±10% (2,000-10,000 ppmv)
CO (tracer)	GEM-2000 Plus CES- LANDTEC (EC Cell)	RSKSOP- 314v1	0 – 2000 ppmv	100 ppmv	100, 500, 1000 ppmv	±10% (0-2000 ppmv)
R-123 (tracer)	Bacharach H25-IR Industrial Refrigerant Leak Detector (IRGA)	RSKSOP- 313v1	0 – 10,000 ppmv	Internal source (25.3 ppmv)	200, 1000 ppmv	±10% (0-1000 ppmv)
H₂S	GEM-2000 Plus CES- LANDTEC (EC Cell)	RSKSOP- 314v1	0 – 500 ppmv	100 ppmv	25,100, and 200 ppmv	±10% (0-500 ppmv)
H ₂	GEM-2000 Plus CES- LANDTEC (EC Cell)	RSKSOP- 314v1	0 – 1000 ppmv	100 ppmv	100, 500 ppmv	±10% (0-1000 ppmv)
VOCs	Thermo Scientific TVA- 1000B (FID)	RSKSOP- 320v0	1.0 – 10,000 ppmv	0.0, 10, 100, 1000, 9000 ppmv CH ₄	10, 100, 1000, 9000 ppmv CH ₄	±25% or ±2.5 ppmv, whichever is greater, from 1.0 to 10,000 ppmv.
VOCs	Thermo Scientific TVA- 1000B (PID)	RSKSOP- 320v0	0.5 – 500 ppmv	0.0, 250, 475 ppmv	250, 475 ppmv Isobutylene	±25% or ±2.5 ppmv, whichever is greater, from 0.5 to 500 ppmv.

Table 5. Soil Gas Sample Field Screening Methods and QA/QC Requirements* from SOPs

Measurement	Analysis Method	Blanks** (Frequency)	Calibration Check Standards (Frequency)	Second Source Standards (Frequency)
O ₂ , CO ₂ , CH ₄ ,	RSKSOP-314v1	0 (beginning & end of each sample event)	+/-1% of reading (beginning & end of each sample event)	+/-1% of reading (after each calibration, optional for this project)
CO, H ₂ S, (H ₂ ***)	RSKSOP-314v1	0 (beginning & end of each sample event)	+/-1% of reading (beginning & end of each sample event)	NA
CO	RSKSOP-315v1	0 (beginning &	90-110% of known value (after calibration,	NA
		end of each sample event)	beginning & end of each sample event) 90-110% of	
R-123	RSKSOP-313v1	0 (beginning & end of each	known value (after calibration, beginning & end	
	KSKSUF-313VI	sample event)	of each sample event; every 2 hours)	
Total	RSKSOP-320v0	0 (beginning & end of each	90-110% of known value (after calibration, beginning \$ and	NA
Hydrocarbons		sample event)	beginning & end of each sample event)	N

Corrective actions are detailed in the SOPs.

^{*}Duplicate sample not appropriate for measurements from a sample train.

^{**}Meter readings

^{***}to be added to SOP later

Table 6. Soil Gas Sample Fixed Laboratory Methods and QA/QC Requirements

Measurement	Analysis Method	Blanks (Frequency)	Calibration Checks (Frequency)	Second Source (Frequency)	Duplicates (Frequency)	Matrix Spikes (Frequency)
Ar, He, H ₂ , O ₂ , N ₂ , CO ₂ , CH ₄ , C ₂ H ₆ , C ₂ H ₄ , C ₃ H ₆ , C ₃ H ₈ , iC ₄ H ₁₀ , nC ₄ H ₁₀ , iC ₅ H ₁₂ , nC ₅ H ₁₂ , C ₆ +	Modificati on of ASTM D1945-03	None Detected (after calibration, every 10 samples, end of run)	(after calibration, every 10 samples, end of run)	85-115% (after each calibration)	RPD <15% (every 10 samples)	NA .
Δ13C and δD of CH ₄ and δ13C for CO ₂	Gas stripping and IRMS	Will obtain from Isotech (after calibration)	⊴0.5 per mil (after calibration, every 10 samples, end of run)	⊴0.5 per mil Will obtain from Isotech	≤0.5 per mil (every 5 samples)	NA
Δ14C for CH ₄	Will obtain from Isotech	< 0.35 pMC Will obtain from Isotech	+/- 1 pMC Will obtain from Isotech	+/- 1 pMC Will obtain from Isotech	Will obtain from Isotech	NA

Table 7. Summary of quality control samples, purpose, method, and frequency to support gas analysis at a fixed laboratory.

QC Sample	Purpose	Method	Frequency	Acceptance Criteria
Equipment Blanks	Ensure that construction materials in gas sample bags and the sample train are not a source of vapors or gases of concern	Fill sample bags with zero-grade N₂ gas via the sample train.	One sample per day	< Detection limit
Travel Blanks	Ensure that cross- contamination does not occur during sampling or transport to the laboratory	Fill sample bags with zero-grade N ₂ gas and place in shipping container with other samples.	One sample per shipment	< Detection limit
Duplicates	Check precision of sampling method and analysis	Use a tee to collect two samples simultaneously.	One sample every 10 samples	RPD < 20%

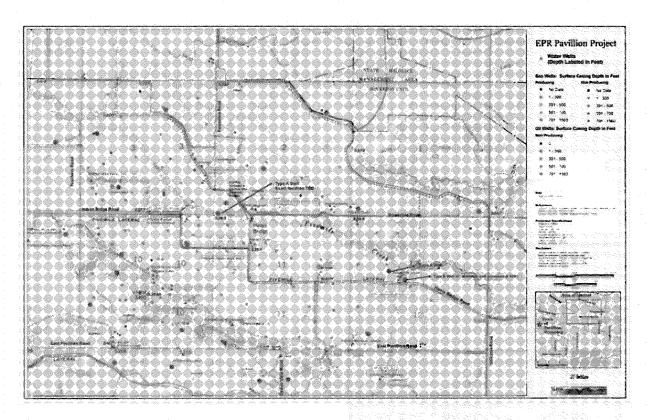


Figure 1. Outline of study area and location of Type A and B monitoring wells

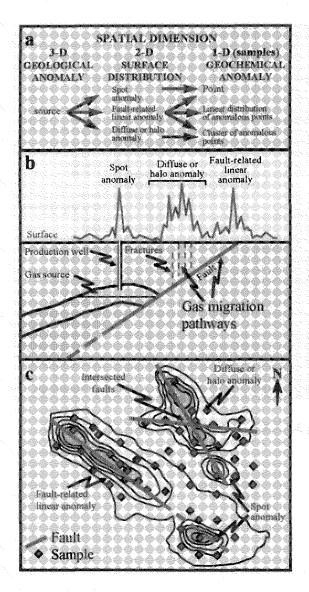


Figure 2. Different types of geochemical anomalies in relation to their spatial dimension (a). Frames (b) and (c) show section and plan view, respectively, of the possible types of geochemical anomalies occurring in faulted areas. Frame (b) shows the case of a gas reservoir confined in a structural tap by low-angle faults, which constitute enhanced permeability pathways for gas migration toward the surface. At the surface, this causes anomalies with different geometry (being the surface expression of fractures and faults), as well as their shifting some distance away from the gas source. In some cases, the anomaly could be the direct result of production activity (i.e., spot anomaly) (From Ciotoli et al., 2004).

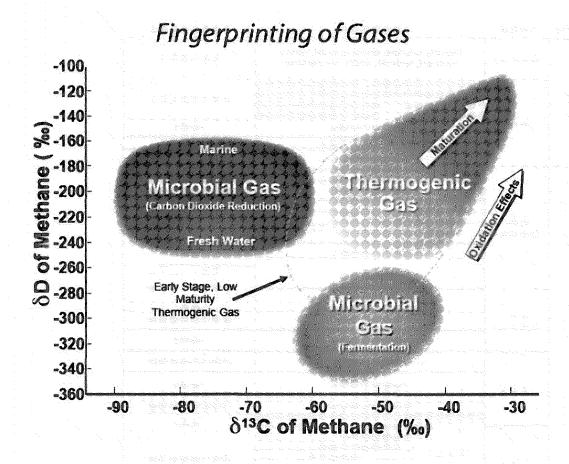
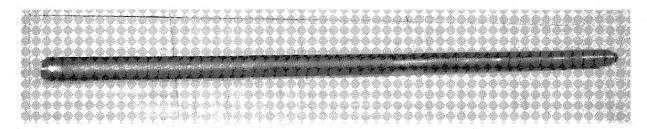


Figure 3. Plot of δ 13C versus δ D for methane to discern the origin of methane. Figure from Isotech Laboratories.

ERATHEM	SYSTEM		GEOLOGI	CUNIT	HYDROLOGIC ROLE		
	Quaternary	Deposits in pediment	rcluding: alluv ;, landslide, gl	rial, colluvial, terrace, acial, and travertine	Local aquifers		
CENOZOIC		Wiggins Formation Tepse Trail Forms Aycross Formation	illion	Leaky confining layer			
ပ	Tertiary		Wind River F	Aquifer			
			Indian Meadow	rs Formation	Leeky confining layer		
			Fort Union F	~~~~~	Aquifer		
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	\$1.55 A	Mesaverde Fori		Omaton			
	Upper	wiesaverue ron	HAUGH	Cody Shale	Aquifer		
	Cretaceous		Niobrara Fo	Leaky confining layer			
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	deal are steen below area was come for		Mowry:	and the are recovered and the contract of	Leaky confining layer		
皇	Lower		Muddy Sar		Aguifer		
MESOZOIC	Cretaceous	Leaky confining layer					
Z E			Cloverly Fo	rmation	Aquifer		
		~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	Morrison Fo	Leaky confining layer			
	Jurassic		Sundance F	Aquifer			
	6. 6.1 48. ₈₆ .		Gypsum Spring	Leaky confining layer			
		Nug	iget Sandstone	Aquifer			
		Popo Agia Formati Crow Mountain		mation tain Formation			
	Triassic	Chugwater		Aicova Limestone	Leaky confining layer		
Triangle Land	production.	Group	В	ed Peak Formation	e and the free from the		
			Dinwoody F	orreation	Aquifer		
		Phosph	$\sim\sim\sim\sim$	Park City			
	Permian	Format	ion >	Formation	Leaky confining layer		
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		Darwin Sandster Memb		mauon			
PALE020IC	Mississippian	~~~~		~~~~~	Aquifer system		
		~~~~	Madison Lii	mestone — — — — — — — — — — — — — — — — — — —			
	Devonian	Darby Fermation	w Fermation				
	<u> </u>		$\infty$	and in			
	Ordovician		Bighorn D	olomite			
	Cambrian		Leaky confining layer				
	anno ann a mar ta aithe an ta		Gros Ventre	Formation			
			And and the second of the seco	ridstori <b>e</b>	Aquifer		

**Figure 4**. Stratigraphic section and hydrologic roles of rocks on the Wind River Indian Reservation, Wyoming. From USGS (2005)



**Figure 5**. Photograph of bomb sampler to be used to sample water from Type A and Type B monitoring wells

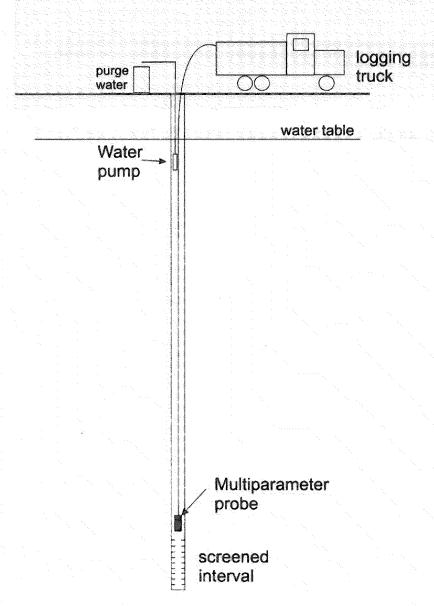
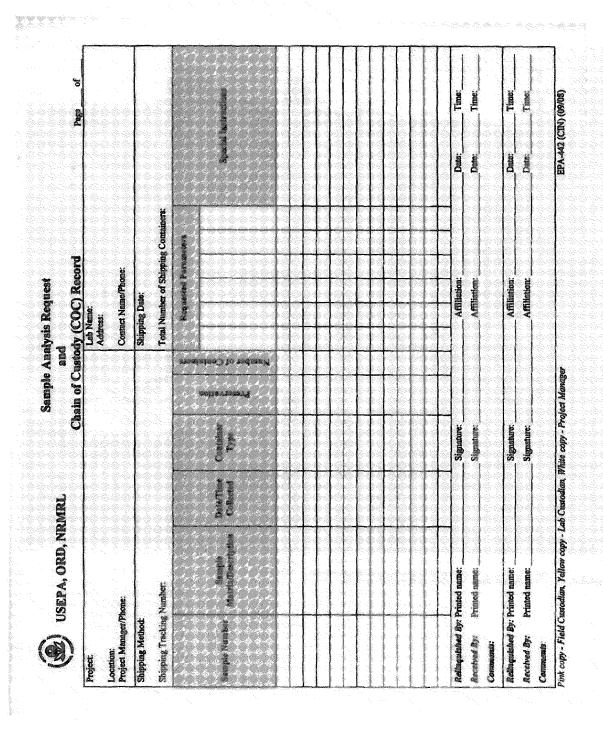


Figure 6. Sample train for ground-water sampling



**Figure 7.** Chain of Custody form for submittal of water samples to R.S. Kerr Environmental Research Center.



Figure 8. Phototgraph of soil-gas sampling train

Location Identification: Latitude: Longitude: PRT/Probe

Length of Tubing (ft)

Flow (sccm) Headloss ("H2O)

Flow (sccm) Headloss ("H2O)

Flow (sccm) Headloss ("H2O)

Flowmeter (Cole-Parmer or Gilmont) Ball (Stainless-steel or glass)

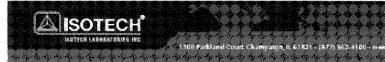
Date					\$ ts	Sample	Train				§	Chamb	e
Time	Ball Reading	SG Flow (sccm)	Vacuum (in H20)	O2 (%)	CO2 (%)	CH4 (%)	CO/R-123 (ppmv)	H2S (ppmv)	H2 (ppmv)	FID (ppmv)	PID (ppmv)	O2 (%)	CO/R-123 (ppmv)
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**Figure 9**. Spreadsheet for manually recording readings from the LANDTEC-CES GEM2000 Plus Gas Analyzer



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Figure 10. Chain of Custody form for submittal of soil-gas samples to Isotech Laboratories



## **Material Safety Data Sheet (MSDS)**

SECTION 1
TRADE NAME Gas Samples non-pressurized, flammable (UN3 167)
CHEMICAL NAME AND SYNONYMS Methana Gas, Hydrocarbon Gas Mixture, Natural Gas

## SECTION II -

HAZAGDOUS INGREDIENTS Methane (CAS 74-82-9) 5-99% Carbon doxide (CAS 124-38-9) Nitrogen (CAS 124-38-9) 0 - 50% 0 - 95% 0 - 10% Ethene (CAS 74-84-0) Propone (CAS 74-98-6) Butone (CAS 106-97-8) 0- 5% 0- 2% CxH2x+2 (x=5 and above) 0- 1%

Gas samples may also contain trace quantities (<0.1%) of various organic gases not listed above.

## SECTION III - PHYSICAL DATA

Selubility: appreciable.
Selubility: appreciable.
Appearance (Color, Oder, etc.): colorless, tasteless and normally odorless gas, however may have a characteristically organic odor.
Boiling Point: less than -258°F
Specific Gravity: see Gas Density

Vapor Pressure: not established Percent Volatle (Volume %): 100 Evaporation: n/a Gas Density: 0.6 to 1.2 (sir = 1.0)

## SECTION IV -

ERE AND EXPLOSION HAZARO DATA

Gas Samplescan present a fire hazard. Being a mixture, the gas can explode violently on contact with any source ofignition.

Flash Points less than -305F (est.)

Autoligation Temps: approx. 930°F
Flammability Limits: LEL 5% to UEL 15%
Extinguishing Media: Carbon discide or drychemical.
Special Fire Fighting Procedures: For fires involving this material do not enter any enclosed or confined fire space without proper protective equipment. Read the entire MSDS.

# SECTION V HEALTH HAZARD INFORMATION

Electric HAZARD INFORMATION

Eye Contact: Not expected to cause eye irritation

Skin Contact: Not expected to be irritating to the skin.

Inhalation: Breathing high concentrations of gas samples is not expected.

Chronic Effects: Not expected.

EMERGENCY FIRST AID PROCEDURES

Experiment 1 is 1 And Proceedings.

Bye Contact: If irritation occurs, flush eyes immediately with fresh water for at least 15 minutes while holding the eyelids open.

If irritation continues, seek medical attention.

Skin Contact: Not applicable inhelation: Not applicable inhelation: Not applicable ingestion: Not applicable

SECTION VI - REACTIVITY DATA
Stability (Thermal, Light, etc.): Stable, avoid heat, sparks and open flame,
Incompatibility (Materials to Avoid): Oxidizers
Hazardous Decomposition Products: Combustion may produce carbon monoxide, carbon dioxide, ethylene, and acetylene.

Hazardous Polymerization: Will not occur.



SECTION VIL.

SPILL OR LEAK PROCEDURES

Eliminate all sources of ignition in vicinity of released gas. Stop gas flow if it can be done without risk. Ventilation is required to keep concentrations below the explosive range.

Waste Disposal Methods: Burn through a flare stack in accordance with federal, state and local regulations.

## SECTION VIII-SPECIAL PROTECTIVE INFORMATION

Eye Protection: No special eye protection is required. Skin Protection: No special skin protection is required. Respiratory Protection: No special respiratory protection is normally required.

SECTION IX - SPECIAL PRECAUTIONS
Flammable gas. Ground all lines and equipment used with gas to prevent static sparks. Do not smoke where gas is used or stored.
A 19.5% coagen concentration in air is the minimum recommended for working without special breathing equipment.

Figure 11 MSDS to accompany soil-gas samples exceeding 5% methane.

# **APPENDIX A**

See accompanying pdf file "Appendix A Isotech QAP"